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COUNTY OF SAN LUIS OBISPO
DEPARTMENT OF PLANNING AND BUILDING
STAFF REPORT

PLANNING COMMISSION

Promoting the wise use of land
Helping build great communities

MEETING DATE	CONTACT/PHONE	APPLICANT	FILE NO.
January 12, 2006	James Caruso, Senior Planner Project Manager (781-5702)	Pacific Gas & Electric	DRC2004-00165/00166

SUBJECT

Hearing to consider a request by Pacific Gas and Electric for a Coastal Development Permit/Conditional Use Permit (CDP/CUP) to allow the replacement of eight (8) existing steam generators and construction of a temporary staging area to consist of the following buildings: 1) a 10,000 square foot replacement steam generator storage building; 2) 10,000 to 15,000 square foot temporary warehouse space and 20,000 to 25,000 square feet of laydown area, 3) 5,000 square foot training facility, 4) 5,000 square foot fabrication facility, 5) office space of approximately 10,000 square feet, 6) approximately 10,000 square foot temporary containment access facility, 7) decontamination facilities, 8) additional parking. Project elements 1-8 will be removed from the site once the steam generator project has concluded (by 2014); and 9) storage of the old steam generators in a proposed 18,000 square foot reinforced concrete building until plant decommissioning in 2025 or later. The project will result in no new disturbance on the site. The proposed project is within the Public Facilities land use category and is located at the Diablo Canyon Nuclear Power Plant approximately seven miles north of the community of Avila Beach and seven miles south of the community of Los Osos. The site is in the San Luis Bay (Coastal and Inland) planning area.

RECOMMENDED ACTION

1. Consider and rely on the Final Environmental Impact Report that was previously certified by the Le Agency (California Public Utilities Commission).
2. Approve Development Plans DRC2004-00165 and DRC2004-00166 based on the findings listed in Exhibits A, B and C and the conditions listed in Exhibits D and E

ENVIRONMENTAL DETERMINATION

The Environmental Coordinator finds that the previously certified Final Environmental Impact Report (FEIR) is adequate for the purposes of compliance with CEQA because no substantial changes are proposed in the project which will require major revision of the previously certified FEIR, no substantial changes occur with respect to the circumstance under which the project is undertaken which will require major revision of the previously certified FEIR, and no new information of substantial importance has been identified which was not known at the time that the previous FEIR was certified.

LAND USE CATEGORY	COMBINING DESIGNATION	ASSESSOR PARCEL NUMBER	SUPERVISOR DISTRICT(S)
Public Facility	Local Coastal program (LCP) Sensitive Resource Area (SRA) Geologic Study Area (GSA) Energy and Extractive (EX)	076-011-018	3

PLANNING AREA STANDARDS:
Areawide 5. Sloping Sites; EX 5. DCNPP Access; SRA 9, 10 , 11

LAND USE ORDINANCE STANDARDS: 22.32 – Electric Generation Plants; 22.50 – Fire Safety

EXISTING USES:
Nuclear Power plant; access road; electrical switching yard and other power plant appurtenant uses

SURROUNDING LAND USE CATEGORIES AND USES:
North: Agriculture/undeveloped/agriculture
East: Agriculture/undeveloped
South: Agriculture/agriculture/undeveloped
West: None/Pacific Ocean

OTHER AGENCY / ADVISORY GROUP INVOLVEMENT: The project was referred to: Avila Valley Advisory Group, Public Works, Environmental Health, Ag Commissioner, County Parks, CDF, APCD, Department of Fish and Game, Cal Trans, California Coastal Commission	
TOPOGRAPHY: Gently sloping	VEGETATION: Previously paved areas
PROPOSED SERVICES: Water supply: On-site well Sewage Disposal: Individual septic system Fire Protection: CDF/County Fire Dept	ACCEPTANCE DATE: March 18, 2005

PROJECT BACKGROUND

Diablo Canyon Power Plant is located within the Irish Hills approximately seven miles northwest of Avila Beach and directly southeast of Montana de Oro State Park in unincorporated San Luis Obispo County. The Diablo Canyon Power Plant (DCPP) is located within a 12,000-acre area of along the coast in central San Luis Obispo County. The DCPP occupies 760-acres and is a high-security zone.

The closest residential communities to the site are Avila Beach and Los Osos. Avila Beach is approximately seven miles southeast of the project site and Los Osos is eight miles north of the proposed project site. There are several existing roads in the project area; however none are open to the public.

The power plan has two identical nuclear reactor units, called Units 1 and 2. These two nuclear reactors are housed in separate but adjacent containment buildings. PG&E received two separate Certificates of Public Convenience and Necessity from the California Public Utilities Commission, authorizing construction of the Units 1 and 2 in 1967 and 1969, respectively

Both DCPP units have four steam generators; each generator consists of U-tube heat exchangers that convert heat from the reactor coolant system into steam to dive the turbine generators and produce electricity. The steam generators were designed and constructed in the 1960s. The steam generators are approximately 16 feet in diameter, approximately 68 feet high and weigh 330 tons.

Each unit operates on 18- to 21-month refueling schedules. A refueling outage is a planned period of time, typically 30 to 40 days. The outage with steam generator replacement is 75 to 80 days and during this time the power plant temporarily ceases operations in order to replenish the enriched uranium needed to fuel electricity production.

The California Public Utilities Commission (CPUC) was the Lead Agency for CEQA purposes for this project. The CPUC has the authority to determine what rates PG&E can charge its ratepayers for the proposed project. The CPUC has certified the Final EIR, has approved a project and approved rates. The following project description has been approved by the CPUC and is now Pacific Gas and Electric's (PG&E) proposed project.

Proposed Project

The proposed project would replace the original steam generators (OSG) at DCPP Units 1 and 2. Each reactor unit consists of four steam generators, for a total of eight steam generators that would be replaced on the site. The OSG need to be replaced because of degradation from stress, corrosion cracking, and other maintenance difficulties. The replacement steam generator (RSG) will be manufactured by an international company and upon completion would be shipped to Diablo Canyon. Because the steam generators for the Units 1 and 2 would be replaced at different times, the RSGs would be delivered in two separate shipment groups, each containing four steam generators

Approximately 90,000 square feet of temporary staging facilities and areas would be needed to support the RSG project activities. These areas would be used to support most project activities and would consist of offices, fabrication, mock-up, weld testing and training, warehouse, and laydown areas. The RSGs would be protected and staged in this area. The steam generators would be switched out at a time when the OSGs were scheduled for regular refueling outage. Each OSG would be removed in one piece from the containment building, through the equipment hatch, over the auxiliary building roof and through the fuel handling building.

After removal, the OSGs must be prepared in accordance with Nuclear Regulatory Commission requirements in order to be stored in the OSG Storage Facility. The OSGs would then be decontaminated in the containment structure and treated with a plastic coating to prevent the release of any potentially loose contaminated material. The OSGs would then be lifted and transported to the site, where they would be secured and moved to the onsite OSG Storage Facility. They would remain at the OSG Storage Facility until plant closure and decommissioning.

The RSGs would be stored in the RSG storage facility until a time for scheduled maintenance of the OSG. During the refueling outage, the RSG would be moved to the outside containment lift system and installation would essentially be the reverse of removal: lift systems would transport the RSGs through the fuel handling building, over the auxiliary building roof, through the equipment hatch and into the containment building.

Staging and Preparation

A temporary staging area would be used to house most project activities and would consist of offices, fabrication, mock-up, weld testing, warehouse, and laydown areas. Approximately 90,000 square feet would be required in temporary or existing facilities to perform the required project staging activities. The RSGs would be stored and prepared for installation in a temporary enclosure located within the temporary staging area. The storage area will require about 10,000 square feet. Additional containment access facilities will also need to be constructed in the temporary staging area to support the increase number of workers who will be working on the replacements.

Original Steam Generator Removal, Transportation and Storage

The preferred method for removing the OSGs would be to haul them out of the containment building through the equipment hatch over the auxiliary building roof and through the fuel handling building. RSG installation would employ the same method as used for OSG removal, only in reverse. In order to be able to remove and install the steam generators in this way the following must first occur:

- Two temporary auxiliary cranes would be installed within the containment building to facilitate removal, replacement, and installation of new permanent structures, piping, and steam generator appurtances within the steam generator compartments. The electrically powered hydraulic cranes would augment the polar gantry crane (i.e., the crane that operates within a containment building on runway rails at or above the opening floor level) and thus improve equipment-handling activities.

- A steel runway system would be installed inside the containment area for transporting the steam generators through the equipment hatch. The runway would span from the equipment hatch to the far side of the refueling pool where it would abut a platform trailer. The runway would be skewed within each unit to minimize interference with the biological shield wall. The runway system would be designed in accordance with the NRC license requirements.

The OSG's would be removed with the following steps:

- The OSG would be cut from its support system within the containment structure.

- The OSG would be hauled out of the containment as an intact assembly using a temporary lifting device (TLD). The TLD would be a gantry capable of traveling along the rails of the polar crane girders. The TLD would be designed with sufficient height to allow passage of the steam generators between the crane bridge girders so that the bottom of the steam generator could clear the top of the lower biological shield walls.

- The OSG would be transferred horizontally out through the equipment hatch onto the runway system using a winch to pull it along the rails. One the OSG is moved through the equipment hatch to an outside location on the roof of the auxiliary building, it would be transferred directly onto a hydraulic platform trailer staged on the auxiliary building roof at the end of the runway.

- The hydraulic platform trailer would transport the OSG across the auxiliary building to the west rollup door of the fuel handling building, where it would make a 90-degree turn passing through the fuel handling building at the east rollup door. Once the OSG exited the fuel handling building; it would be transferred from the transporter directly onto an outside runway system.

- A rigging system would be installed to lift the OSG from the runway system, rotate it 90 degrees, and lower it to another transporter below. Final removal plans for handling of the OSG outside of the fuel handling building would need to take into account the existing subsurface conditions, outside interference, wind loading, and the fact that the steam generator centerline would be more than 35 feet above grade as it passed out through the rollup door.

- After the OSG was lowered onto the site transporter, it would be secured and transported to the OSG storage facility.

Original Steam Generator Staging:

Once removed, the OSGs will be treated and prepared for transport and storage. The following activities should be performed to secure and safely transport the OSGs to the storage facility.

- The exterior of the OSGs would be decontaminated as much as possible inside the containment structure or possibly just outside of the hatch, and then a plastic coating would be applied as a prevention measure to secure loose material and prevent the spread of loose contamination. These activities would be performed in accordance with NRC requirements for the handling of low-level radioactive materials.

- Steel covers would be installed on the main openings of the OSGs to seal off the internal sections. These covers would be seal-welded to the nozzles of the main coolant, steam, and feedwater piping openings while the OSGs are still in the containment structure. PG&E would implement procedures and work practices to keep dose levels as low as possible in compliance with NRC regulation.

The proposed method by PG&E of disposing of the OSGs would be to store them onsite during the remainder of DCPP's operating life. The OSG's would then be decommissioned along with the remaining plant equipment after the plant has been shut down. The OSG Storage Facility would consist of an 18,000-square-foot reinforced concrete building at the upper portion of the DCPP site just north of Reservoir Road at the intersection with Oak Tree Lane. The maximum height of the storage building would be 30 feet with dimensions of 180 feet by 100 feet. The addition of the OSG storage facility would be covered by PG&E's current NRC license. Construction permits for the facility will need to be obtained from the County of San Luis Obispo and permits may be required from other potential key parties like U.S. Army Corps of Engineers, State Water Resources Control Board/Regional Water Quality Control Board, and California Department of Fish and Game. The OSG storage facility would be constructed to store and secure all eight OSGs. Construction of the OSG storage facility would proceed in the following steps:

- Relocation of facilities on the site including underground electrical conduits and grounding grid, firewater, domestic water, and sewer lines.

- Excavation for the structures and utilities.

- Installation of utilities and construction of the foundation slab, walls, and roof.

- Backfill, grading, and paving around the completed structure.

Earthmoving equipment would be used to excavate existing soil in preparation for the structure's foundation and associated uses. Foundation would require a maximum cut of five feet into the soil. Approximately 2,300 cubic yards of excavated material, or spoils, would be generated. These spoils would be removed and stored at an onsite disposal facility previously approved for the Diablo Canyon Independent Spent Fuel Storage Installation Project. This site is located in an existing storage yard approximately 200 feet west of the 500kV switchyard. The underground utilities would be relocated according to engineering parameters.

The OSG Storage Facility will be a reinforced concrete structure built on either a reinforced concrete mat foundation or an independent floor slab. The concrete would come from a temporary batch plant, and any necessary water would be provided by DCPP's existing water system. Other construction materials would include: reinforcing steel, structural steel, fine and coarse aggregate, and drainage pipe and wire for utility relocation.

Restoration of the area surrounding the OSG Storage Facility would consist of backfill and asphalt paving around the perimeter after construction had been completed. The walls and roof of the OSG Storage Facility would be made of reinforced concrete to meet maximum permissible dose limits as prescribed by NRC regulations. These regulations specify dose limits for radiation exposure. The OSG Storage Facility would be controlled using locked personnel access doors.

Replacement Steam Generator Installation

The applicant originally proposed to deliver the RSG's to Port San Luis and then truck the generator's seven miles up the plant access road to the staging area. The Final EIR studied an alternative to bring the RSG's to the site via two smaller barges that would enter and moor in the plant's intake cove.

Once inside the intake cove, the barges carrying two RSG's each, would be offloaded using basic methods and equipment. The RSG's would then be transported along existing roads one mile to the storage facility. Conflicts with DCPP's water intake cooling system would need to be analyzed prior to implementation. Weather and offshore conditions would be tracked by a project manager to make certain transport and offloading will be conducted during favorable conditions.

Preparatory work conducted prior to RSG installation would include: OSG removal, RSG preparation by the installation contractor, and plant piping system preparation within the containment structure. The RSGs would be stored in the RSG storage facility until a scheduled refueling outage, during which the steam generators would be replaced.

During this refueling outage, RSGs would be moved from their storage facility to the outside containment lift system behind the fuel handling building. Installation of the RSGs would be in the reverse order as that described for the removal of the OSGs. A network of lift systems and runways would transport the RSGs through the fuel handling building, over the auxiliary building roof, through the equipment hatch and into the containment building.

Decommissioning

The NRC licenses for Units 1 and 2 are set to expire in 2021 and 2025, respectively. The NRC requires that civilian nuclear facilities be decommissioned by safely removing the facility from service and reducing the residual radioactivity to a level that permits release of the property and termination of the operating license. Both the OSGs and RSGs would be decommissioned at the same time as the rest of DCPP components and in compliance with NRC requirements.

The applicant has announced that there is a study in progress to determine whether a license extension to approximately 2050 should be submitted to the NRC. If the plant continues to operate and is not decommissioned in the shorter term, then the OSG storage facility will also remain on site.

Other Project Description Issues

The temporary structures to be used for RSG installation are located in the coastal zone. A total of seven buildings (e.g. offices, fabrication, mock-up, weld testing and training, warehouse - see project description above) will be constructed in the coastal zone and will be used during the life of the installation project (approximately 2009). Once the project is complete, these seven buildings will be removed.

The 18,000 sq ft OSG storage building is located outside of the coastal zone. The OSG building is the subject of a Conditional Use Permit (CUP) due to its inland location. The other buildings are subject to the requirements of the County's LCP and require review and approval of a Coastal Development Permit (CDP). These two permit applications are considered in this staff report with separate findings and conditions.

PROJECT ANALYSIS

Portions of the proposed project are located both within the coastal zone and the inland area of the County. The inland element of the proposed project, the OSG storage building, is located on a previously disturbed area of the site adjacent to the switching yard. The area has historically been used for storage purposes.

Inland Land Use Ordinance Compliance (LUO):

The proposed project is considered an accessory use to an electric generating plant. The plant is allowed in the Public Facilities (PF) land use category and requires review and approval of a land use permit for expansion or major modifications. The addition of an 18,000 square foot concrete structure to store lightly radioactive steam generators is considered a major addition/modification to the facility. The LUO contains some requirements for power plant projects. The proposed project is an accessory use to the power plant. Where applicable, these LUO standards have been included as project conditions.

The inland portion of the project includes construction of an 18,000 square foot reinforced concrete building to store the OSGs. This equipment is proposed to be stored on site until the plant is decommissioned. Decommissioning could take place when the current operating licenses lapse in 2025 or later if the licenses are extended past that date.

The eight OSGs are considered a Class A low level nuclear waste (LLW). These types of wastes can be disposed of only at certain facilities. The only site that will take this type of waste from California after the year 2008 is in Utah.

The applicant has chosen to store the steam generators on the site until the entire site is decommissioned. According to the applicant, this is the best option for the following reasons:

- Minimum on-site exposure: The old steam generators are considered LLW (low level radioactive waste). On site storage would allow the generators to be moved and stored in one piece each at a facility that is located away from any populated areas.

- Avoid potential off site incidents: Storing the generators on site eliminates the potential for unforeseen accidents on transportation routes.

- Avoid on site congestion: Transport of the generators off site would require them to be cut up. This requires a large radiation control area and could interfere with the replacement generator process.

- Avoid off site congestion: The size of the steam generators would require oversized trucks traveling long distances (e.g. Utah). On site storage prevents these over the road shipments.

- Public safety: On site storage is safer than off site transport and storage. The generators will be essentially non-radioactive within 25 years. The decommissioning process can then lead to transport off site.

- Decommissioning efficiency: Specialized equipment, personnel, mobilization and general roadway preparation will be required when Diablo is decommissioned. Moving the generators off site will be more efficient and effective at that time.

Fire Safety

LUO Section 22.50.010 et seq. requires fire safety plans and plan approval for discretionary actions. CDF/County Fire Dept has reviewed the applications and has requested that conditions of approval be placed on the projects. Implementation of the measures outlined in the recommended conditions of approval of both the CDP and CUP will provide an adequate level of fire safety at the site.

These conditions include:

Fire hydrants
Vegetation management
Emergency Response
Industrial fire brigade
Response time
Building evacuation
Fire truck upgrades
Two access points to the site

CDF/County Fire Dept. has reviewed the proposed project and the Draft EIR. The Department has determined that upgrades to fire and emergency systems are required to adequately protect the existing and proposed facilities. The conditions of approval of both permits include CDF/County Fire Dept fire safety requirements.

Coastal Zone Land Use Ordinance (Title 23)

The Coastal Zone Land Use Ordinance (Title 23 of the County Code) contains ordinance requirements applicable to the subject project. Section 23.04.420 contains coastal access requirements for development located in the Coastal Zone between the first public road and the shoreline. The preamble to Section 23.04.420 states:

> "The intent of these standards is to assure public rights of access to the coast are protected as guaranteed by the California Constitution. Coastal access standards are also established by this section to satisfy the intent of the California Coastal Act".

The proposed project complies with the coastal access improvements requirements of Title 23. The applicant has agreed to fund several coastal access projects on the site's south end adjacent to the Port and Avila Beach. These areas located south of the plant tend to absorb the "costs" of the plant's operation. These costs are associated with increased traffic, loss of coastal access and the need to focus on emergency plans and evacuation issues.

Projects to be funded include completion of the road to the Point San Luis Lighthouse (a facility designated "Historic" in the Local Coastal plan); granting of an easement over the road to the lighthouse, removal of impediments to coastal access at the plant's gate; purchase of vans to transport visitors to the lighthouse; and funding of a coastal walkway from Avila Beach to Port San Luis. The total value of funding will not exceed $1.5 million.

The key component of the proposed coastal access projects is the removal of impediments to coastal access. In order to access the lighthouse, visitors must pass through the main gate of the nuclear power plant. Generally, a visitor must give their name, address, date of birth and social security number to access the plant site. Additionally, because the site contains a nuclear facility, coastal visitors must pass guards armed with automatic weapons. The effect is not consistent with policies for open coastal access. The requirement to give up personal information is onerous and is not consistent with the public's right to access the coast. The Port and the applicant have reached a unilateral agreement that eases the requirements for lighthouse access. However, the applicant can institute stricter requirements unilaterally at any time. In addition, coastal visitors must pass through a gate that is guarded by heavily armed security officers. A permanent solution is required to this major coastal access barrier.

Part of the access program identified above includes funding to remove this significant barrier to coastal access. The barrier (the plant's main gate) removal can be accomplished by a variety of possibilities including moving the gate, constructing a bridge that bypasses the gate, and/or creating a fenced corridor that bypasses the gate. However, ensuring that coastal visitors do not have to give their personal information to a private company and pass through a gate secured by heavily armed guards is absolutely essential to allowing for open coastal access.

PLANNING AREA STANDARDS (COASTAL)

The proposed project site is located in the San Luis Bay (Coastal) Planning Area and is designated Public Facility (PF). The County General Plan Land Use Element contains development standards for certain areas including the subject site.

The only standard affecting the site is the part of the EX combining designation:

> Diablo Canyon Nuclear Power Plant Access: Access to the power plant is to remain in the control of Pacific Gas and Electric Company. Development of adjacent land shall not provide access to the power plant site.

The proposed project will comply with this standard to control access to the plant site.

COMBINING DESIGNATIONS:

The proposed project site is located within several combining designations as identified by the Land Use Element of the General Plan.

Sensitive Resource Area: The proposed project is located within a Sensitive Resource Area (SRA) as identified in the Land Use Element of the General Plan. This SRA is described in the San Luis Bay (Coastal) Area Plan and is termed the Coastal Terrace SRA. The proposed project's location in the SRA requires findings be made that indicate the resource under consideration is protected. These findings are found in Exhibit B attached to this staff report.

Generally, all proposed construction will take place in areas that have been previously graded, disturbed and/or paved. The old steam generator storage building (located outside the coastal zone) is proposed for an existing graded storage area. The seven temporary buildings proposed for the coastal zone are located in an existing paved parking area. The displaced parking is proposed to be located in a previously graded and disturbed area.

Energy and Extractive Uses: The project site is located within the Diablo Canyon power plant EX combining designation. This designation requires that uses not adversely affect the continued operation or expansion of the energy or extraction use. In this case, the proposed project will allow this energy facility to operate more efficiently.

COASTAL PLAN POLICIES:

Shoreline Access: Policies within the LCP encourage the protection of existing coastal access and the provision of new access with new development.

> The proposed project is subject to Coastal Act, LCP and Title 23 requirements for provisions of public shoreline access. The applicant has proposed several public access projects and conditions of approval have been recommended so that the project complies with these requirements.

Recreation and Visitor Serving: Coastal Plan policies encourage the preservation of existing recreational opportunities and the expansion of such opportunities. Visitor-serving recreational facilities are given a priority over non-coastal dependent uses.

> Staff Response: There are minimal recreation and visitor serving uses on the site at this time. The Pecho Coast Trail program allows a limited number of hikers to access a portion of the property and to visit the Port San Luis Lighthouse. The recommended coastal access improvements that are part of the proposed project's conditions of approval will enhance recreational and visitor opportunities by: 1) improving road access to the lighthouse, 2) providing longer distance pedestrian access to the coastline between the town of Avila Beach and the lighthouse; and 3) provision of vehicles for enhanced access to the lighthouse. A previously approved project, the ISFSI, provided recreational opportunities on the north portion of the site.

Energy and Industrial Development: Policies in the plan encourage decision-makers to weigh the environmental consequences of allowing continued or expanded industrial and energy land uses. The expansion of existing sites is preferred over the development of new sites, and existing facilities are encouraged to be abandoned when no longer in use.

> Staff Response: The proposed project represents a small expansion of uses on the site of this existing power production facility. The project does not represent development of a new site. The project site will be decommissioned once the licenses lapse.

Commercial Fishing, Recreational Boating and Port Facilities: Policies in the Coastal Plan encourage the protection of commercial fishing and recreational boating facilities, and give priority, where feasible, to the expansion of such facilities.

Staff Response: The applicant has proposed to barge the replacement steam generators into the plant through the intake cove in lieu of using Port San Luis and the plant access road. There are no boating facilities in the vicinity of DCPP or the proposed project site. The nearest boating facilities are located at Port San Luis which is approximately five miles to the east. The proposed project will not adversely affect commercial fishing or recreational boating.

Environmentally Sensitive Habitats: Policies within the plan are intended to protect and preserve such resources from development, and where feasible, to restore and enhance such resources.

Staff Response: The proposed project site and other sites associated with the project have limited biological resource value. According to Section D.3 of the Final EIR, a number of special status animal species have the potential to be found on the site. There are habitats in the vicinity that support several federally listed species, such as the northern sea otter, brown pelican and red legged frog. Conditions have been included that are intended to protect water quality and marine resources that may support these species offsite.

Agriculture: The Coastal Plan encourages the preservation of viable agricultural lands within the coastal zone. The agricultural policies guide agricultural land preservation and identify actions to protect the land and standards to guide development in agricultural areas.

Staff Response: According to Section D.8 of the Final EIR, the proposed project will not result in any adverse impacts on agricultural resources. The proposed project site possesses little agricultural value.

Public Works: These Coastal Plan policies are related to the provision of sewer, water, roads, drainage and other public facilities. The intent of the Public Works policies is to ensure adequate public facilities are available and provided for existing and anticipated development.

Staff Response: The proposed project will not increase the demand for public services, such as water, wastewater collection and treatment, police and fire protection, or other public works. The applicant will institute trip reduction plans to reduce project related traffic.

Coastal Watersheds: Policies in the Coastal Plan are intended to help maintain the long-term viability of such resources and to manage new development so that the viability of such resources is maintained.

Staff Response: Grading and construction of the proposed project site could result in erosion and water quality impacts to Diablo Creek. Mitigation provided in Section D.5 and D.7 of the Final EIR will reduce these impacts to a less than significant level. Therefore, the long-term viability of the watershed will be protected as encouraged by this policy.

Visual and Scenic Resources: Policies in the Plan provide guidance for new development relative to the protection of scenic resources, and encourage the preservation of existing resources.

Staff Response: According to Section D.14 of the Final EIR, new construction will be set among the existing structures in this area of the plant boundary. The new buildings

will be temporary and be removed once the project is complete. The OSG building is only visible in its specific area. Therefore, the intent of this policy will be satisfied.

Hazards: These policies provide guidance for the protection of lives and property from natural and human-made hazards within the coastal zone, including floods, unstable geologic formations, erosion, fire, and bluff top retreat.

Staff Response: The placement of the facility in the proposed location will not increase the risk of hazard to people or property for those aspects of the project not preempted by Federal law. According to Section D.5, Geological Resources of the Final EIR, the site is geologically stable and capable of supporting the facility without undue risk of slope failure or other geologic hazards.

Archeology:. The coastal zone contains numerous important archeological sites, and potentially significant sites. The Coastal Plan contains policies relating to the identification and preservation of such resources.

Staff Response: According to Section D.4, Cultural Resources of the Final EIR, there are cultural resource sites in the vicinity of the project. Mitigation measures are required to prepare cultural resource protection plans and to monitor ground disturbing activities.

Air Quality: This section of the Coastal Plan encourages the preservation and enhancement of air quality through implementation of the policies and programs of the Clean Air Plan.

Staff Response: Air quality impacts associated with the proposed project will be subject to the measures to reduce trips, diesel emissions, NOx emissions compliance with permits issued by the San Luis Obispo Air Pollution Control District. Compliance with these regulations will ensure consistency with this section of the LCP.

ENVIRONMENTAL DETERMINATION:

The California Public Utilities Commission (CPUC) was the Lead Agency for CEQA purposes for this project. The County is known as a "Responsible Agency" under the CEQA Guidelines. As a Responsible Agency, the County uses the Final EIR that has been certified by the CPUC.

The CPUC's Final EIR has determined that there are no significant and unavoidable environmental impacts of the project (Class I impacts).

Mitigation for Class II impacts (significant but avoidable) identified in the Final EIR includes:

1. avoidance of peak travel seasons on Avila Beach Drive;
2. seismic safety measures;
3. slope stability measures;
4. protection of cultural resources;
5. erosion and sedimentation control

The Alternatives section of the EIR studied several alternatives to elements of the proposed project. The alternative for RSG offloading at the Intake Cove is identified as the Environmentally Superior Alternative because unloading directly at the DCPP site would substantially reduce impacts that would be caused during the transport of the RSGs through the access road route.

There is no preferred alternative for the Temporary Staging Area location. On-site OSG Storage is preferred over off-site disposal. No on site alternative locations for the OSG storage building were identified as an Environmentally Superior Alternative.

The Mitigation Monitoring program prepared by the CPUC assigns many monitoring activities to an environmental monitor. The CPUC will be responsible for enforcing these mitigation measures during construction.

COMMUNITY ADVISORY GROUP COMMENTS:

The Avila Valley Advisory Council (AVAC) has commented forwarded comments to the CPUC on the Draft EIR. AVAC has also submitted comments to your Commission (attached). The letter states support for the coastal access projects and for expanded emergency egress routes from the community.

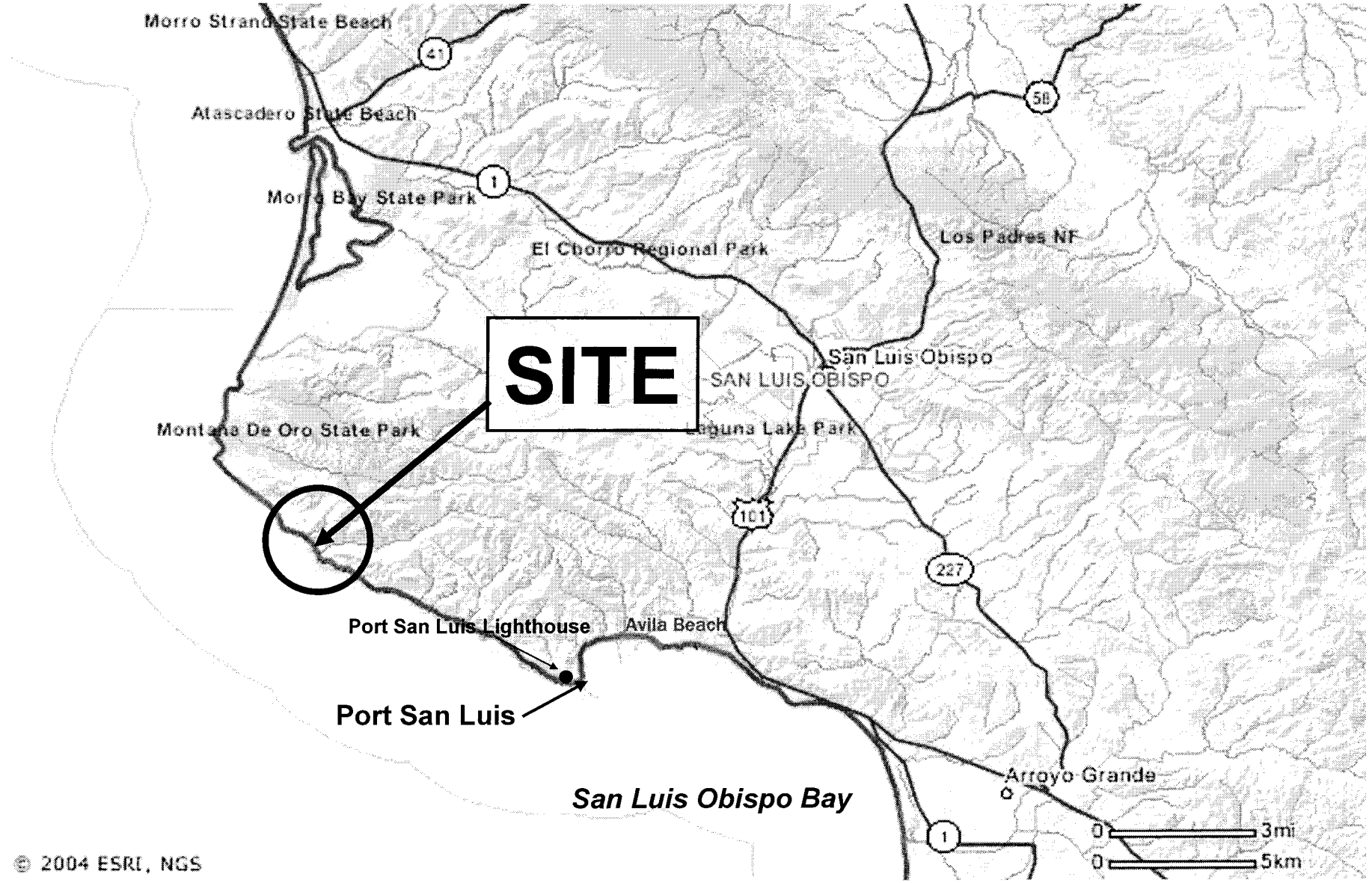
LEGAL LOT STATUS: The existing lot was legally created by deed at a time when that was a legal method of creating lots.

Attachments

1. Graphics
2. Exhibit A - CEQA Findings
3. Exhibit B - CDP Findings
4. Exhibit C - CUP Findings
5. Exhibit D - CDP Conditons of Approval
6. Exhibit E - CUP Conditions of Approval
7. Exhibit F - Mitigation Monitoring Program

Staff report prepared by James Caruso, Senior Planner
and reviewed by Kami Griffin, Supervising Planner

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



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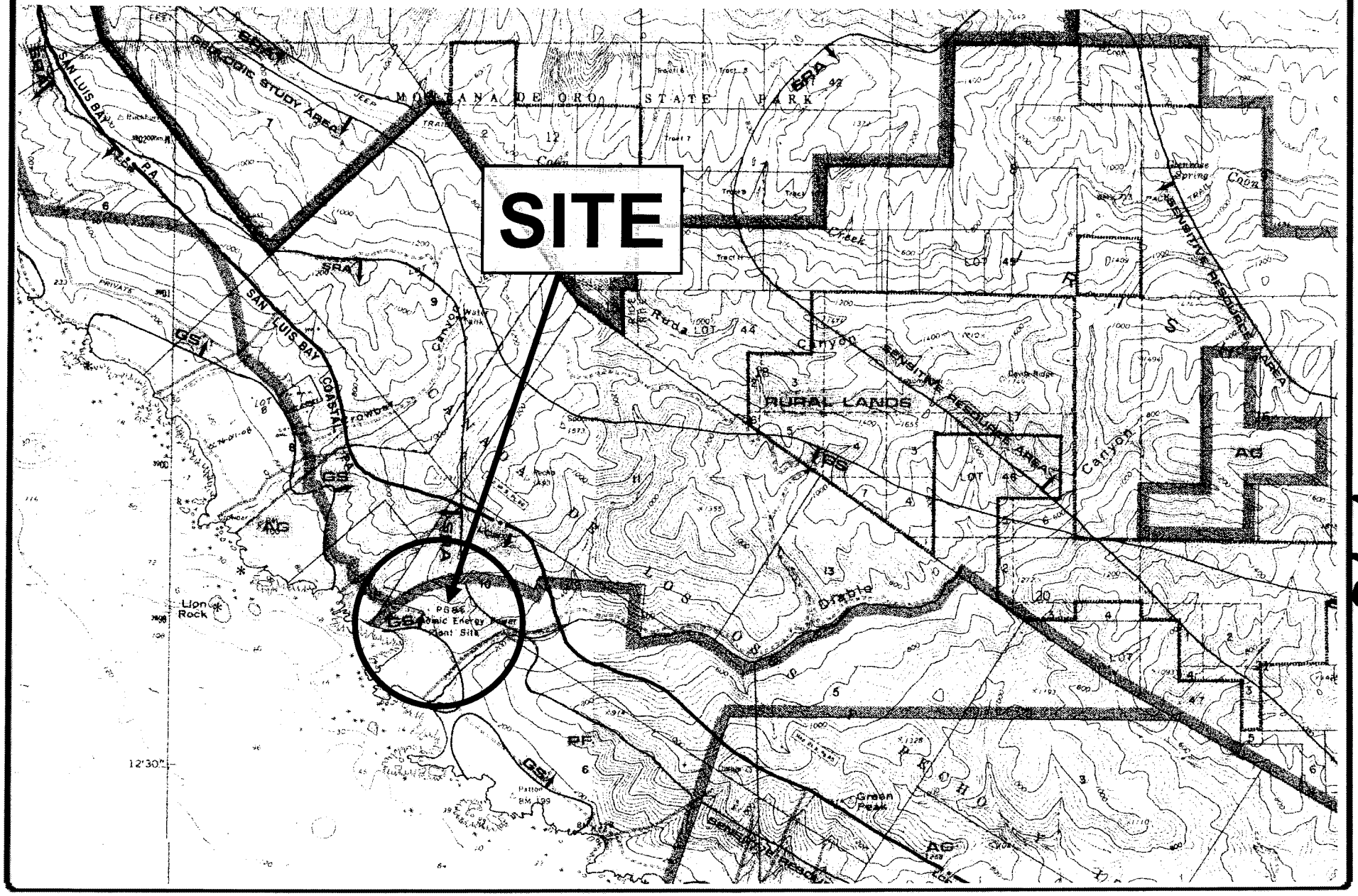
PROJECT

Conditional Use Permit DRC2004-00166 | Coastal Development Permit DRC2004-00165

EXHIBIT

DCPP Vicinity

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



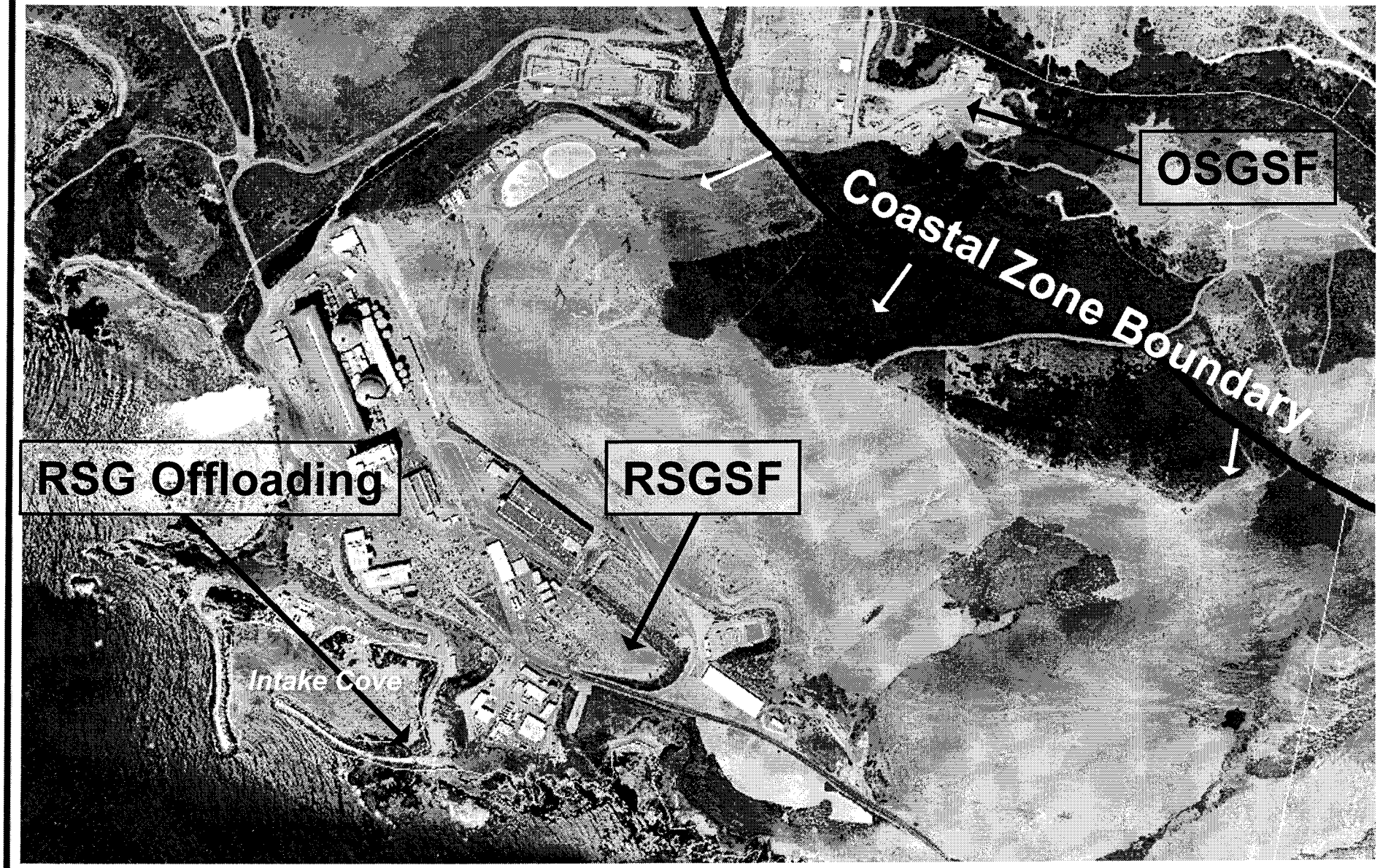
PROJECT

Conditional Use Permit DRC2004-00166
Coastal Development Permit DRC2004-00165

EXHIBIT

Land Use Category

I-15



PROJECT

Conditional Use Permit DRC2004-00166
Coastal Development Permit DRC2004-00165

EXHIBIT

RSG Offloading

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING

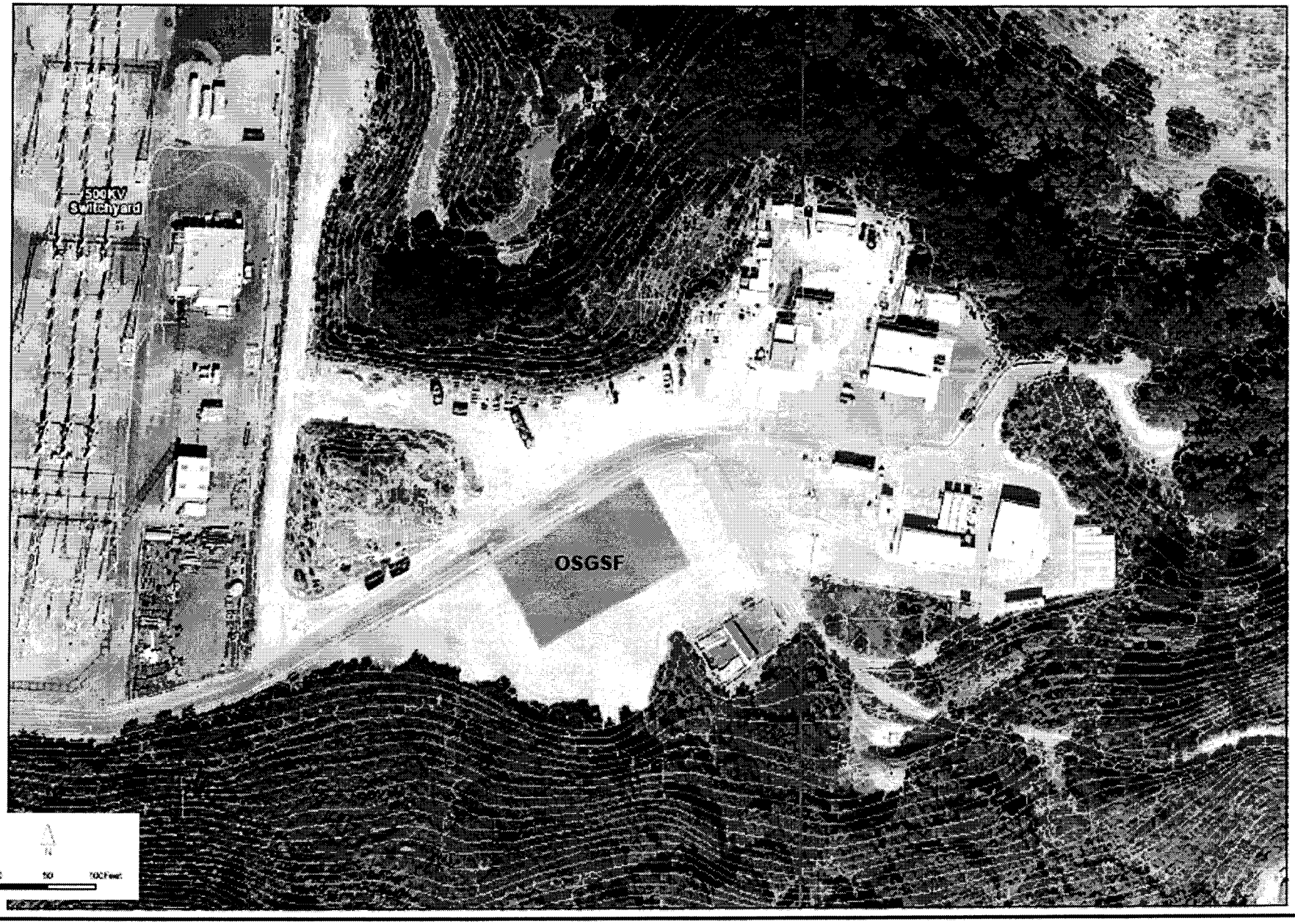
PROJECT

Conditional Use Permit
PG&E DRC2004-00166

EXHIBIT

OSGF Area – Existing Conditions

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



A1-1

PROJECT

Conditional Use Permit
PG&E DRC2004-00166

EXHIBIT

OSGF Area – Site Plan

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING

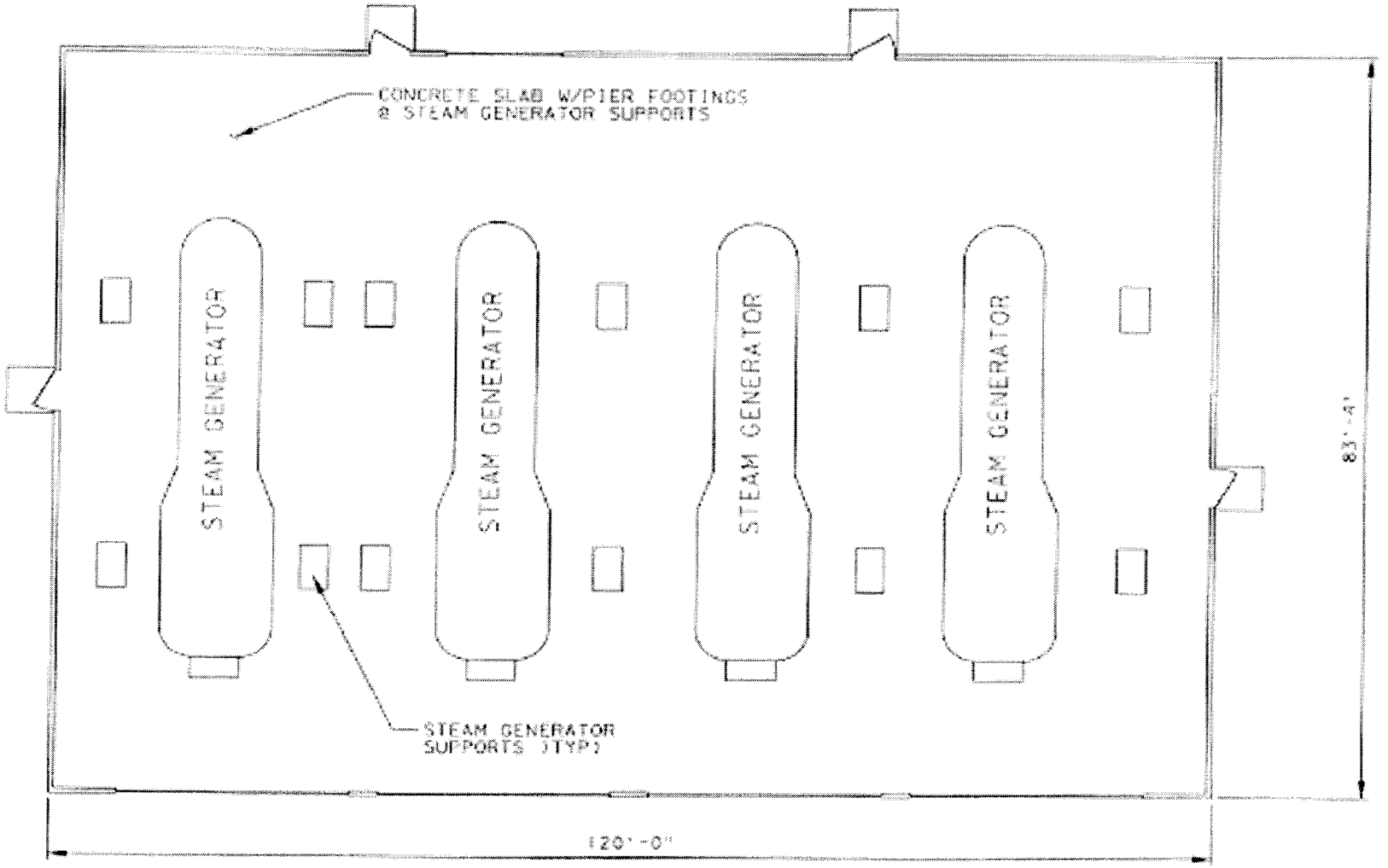
67-1

PROJECT

Coastal Development Permit
DRC2004-00165

EXHIBIT

Site Plan: Road Relocation & TSA Locations



REPLACEMENT STEAM GENERATOR STORAGE FACILITY PLAN

10,000 SQ. FT.

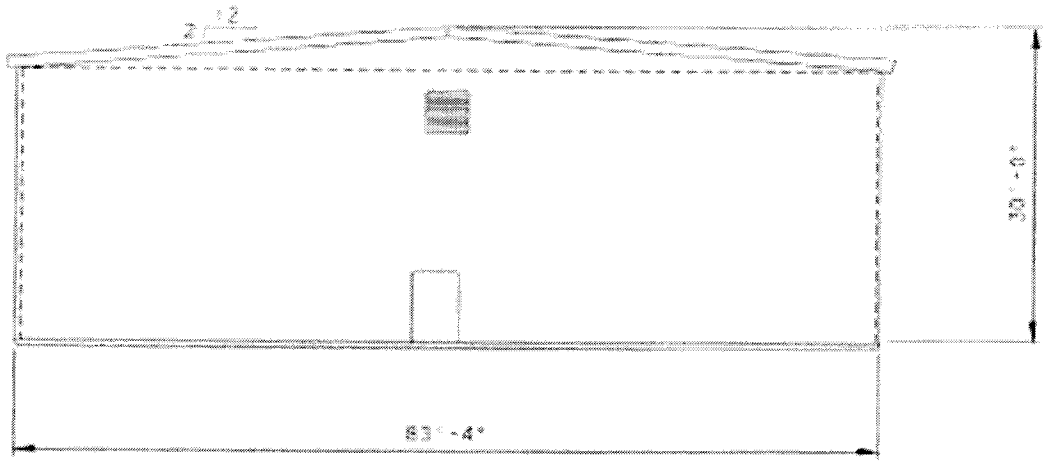
D-20

PROJECT

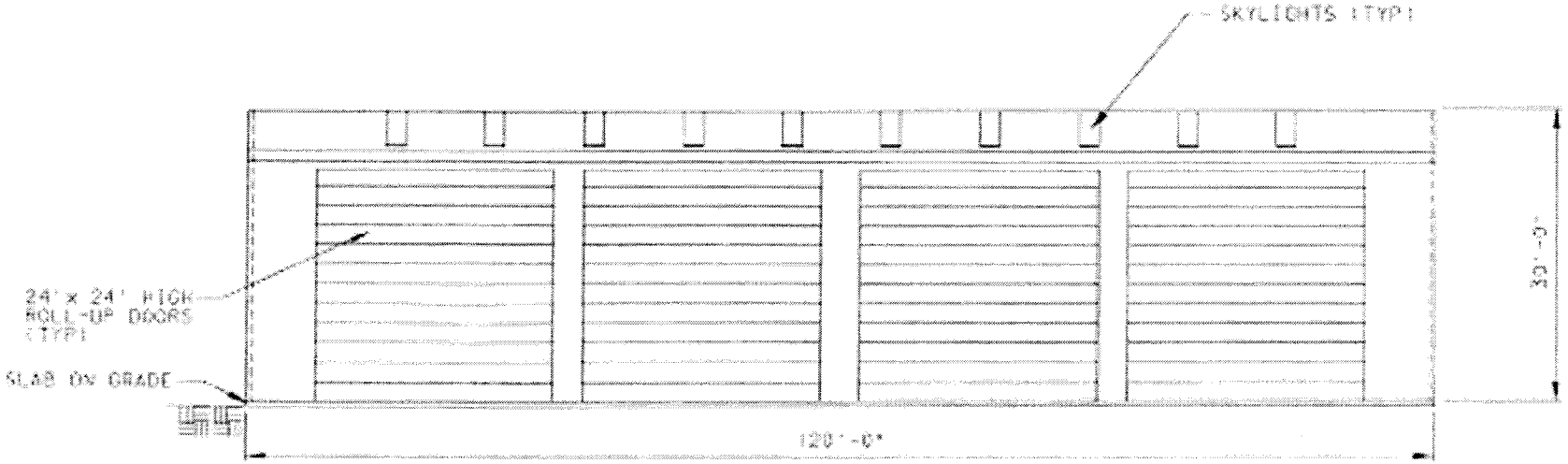
Coastal Development Permit
DRC2004-00165

EXHIBIT

RSG Storage Facility: Floor Plan



RIGHT SIDE ELEVATION



FRONT ELEVATION

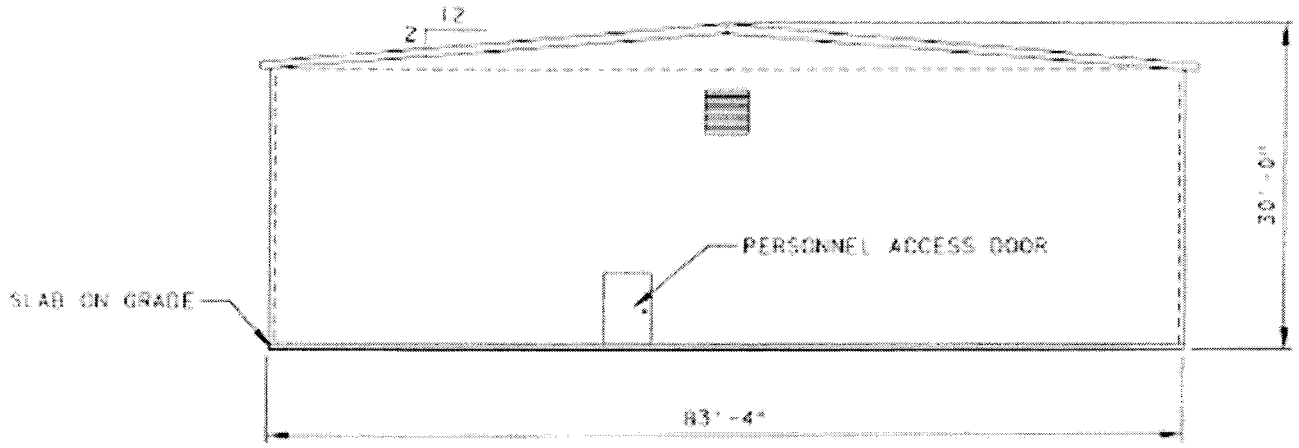
12-1

PROJECT

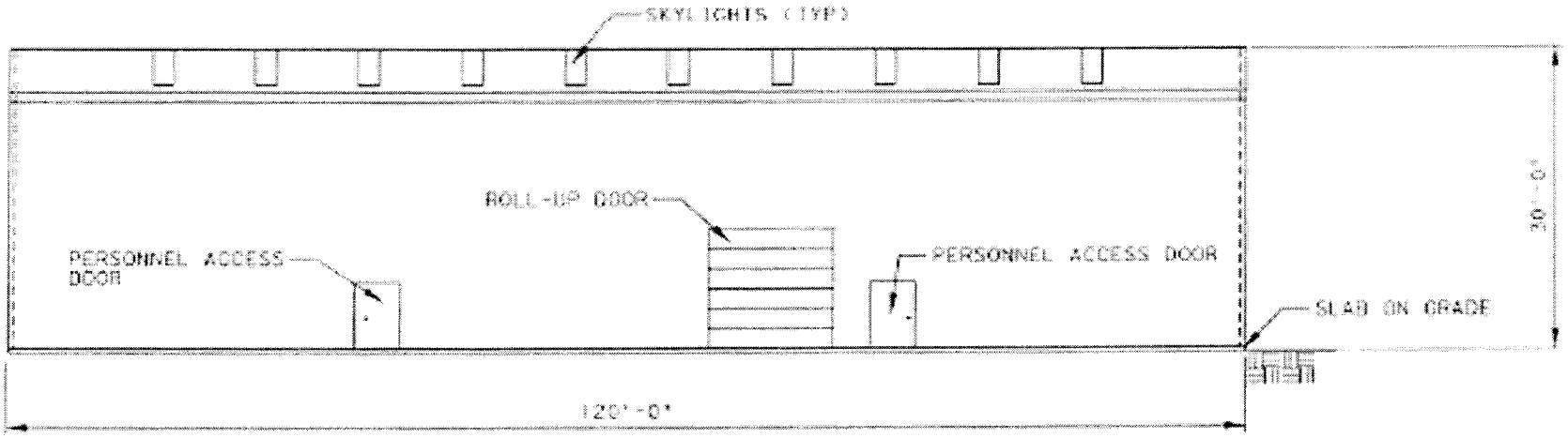
Coastal Development Permit
DRC2004-00165

EXHIBIT

RSG Storage Facility: Elevations (1 of 2)



LEFT SIDE ELEVATION



REAR ELEVATION

1-22

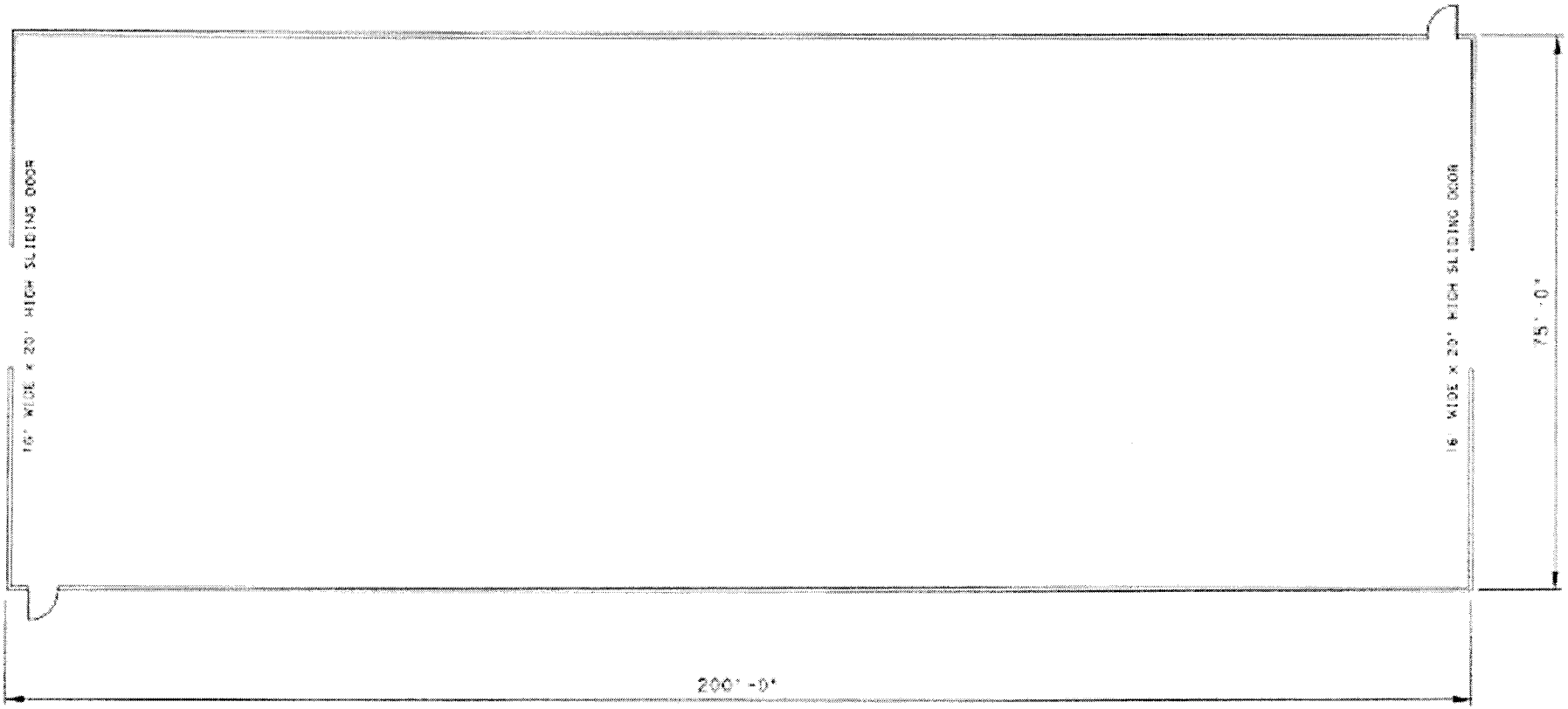
PROJECT

Coastal Development Permit
DRC2004-00165

EXHIBIT

RSG Storage Facility: Elevations (2 of 2)

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING



WAREHOUSE PLAN

15,000 SQ.FT.

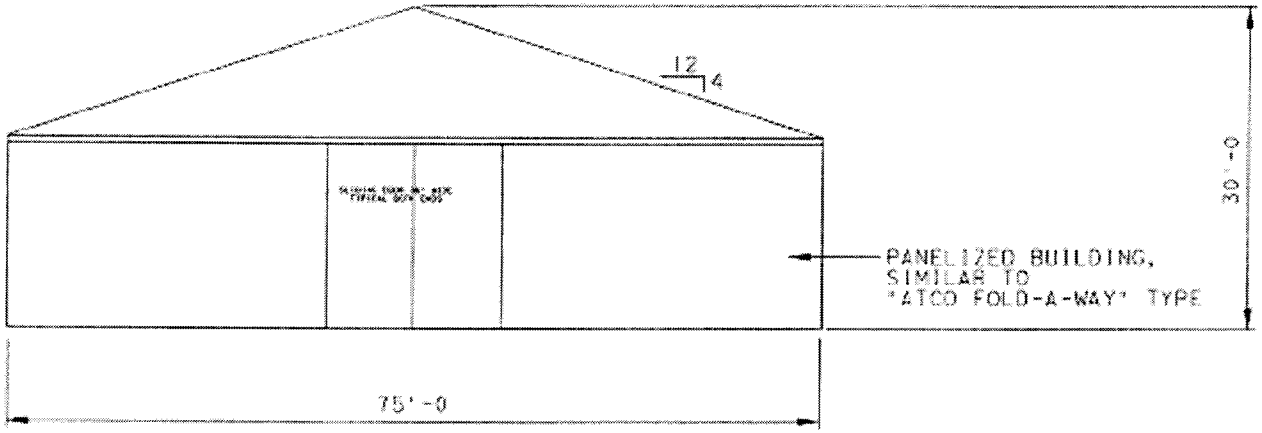
1-23

PROJECT

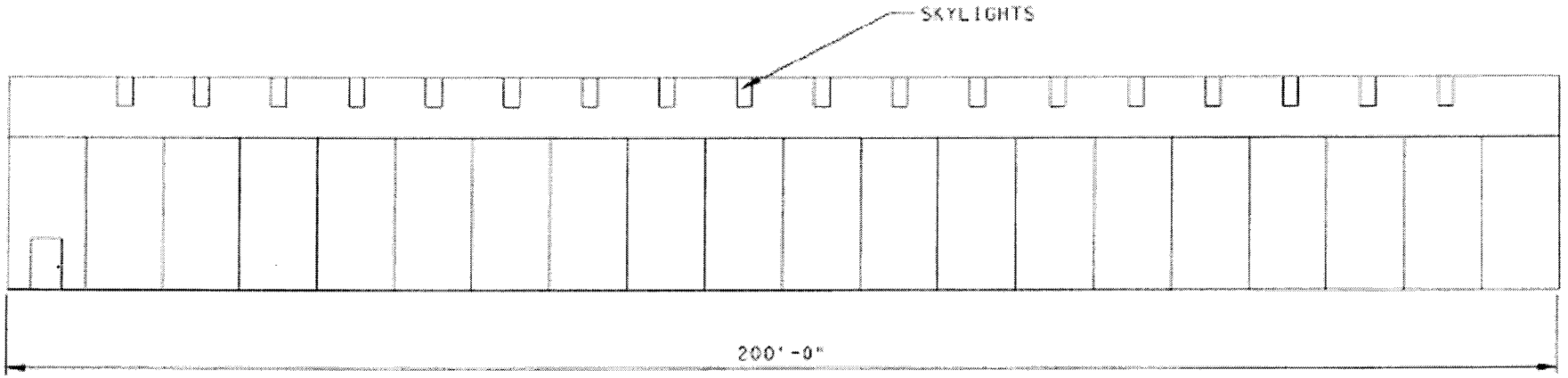
Coastal Development Permit
DRC2004-00165

EXHIBIT

Warehouse: Floor Plan



END ELEVATION



SIDE ELEVATION

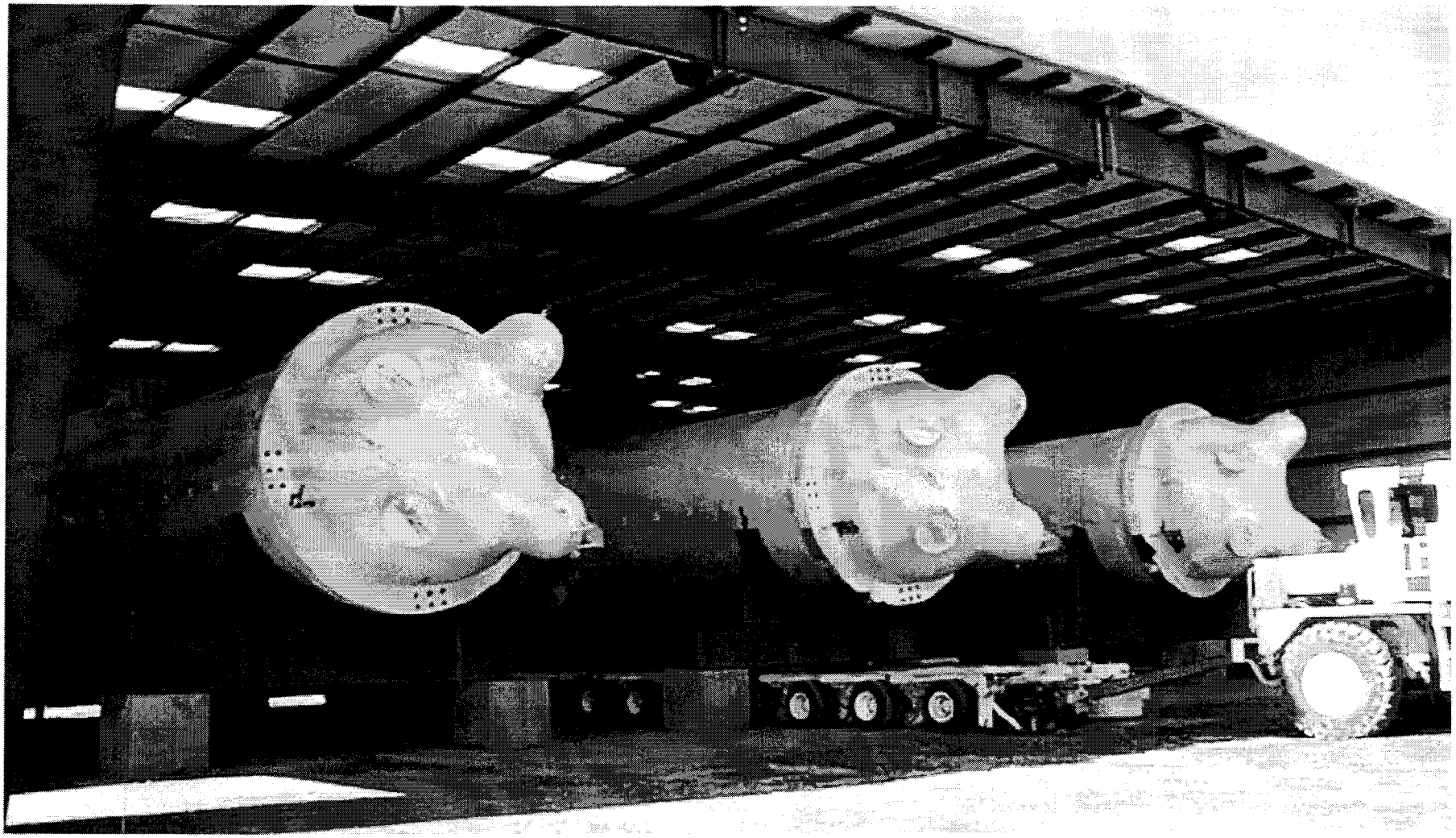
1-24

PROJECT

Coastal Development Permit
DRC2004-00165

EXHIBIT

Warehouse: Elevations



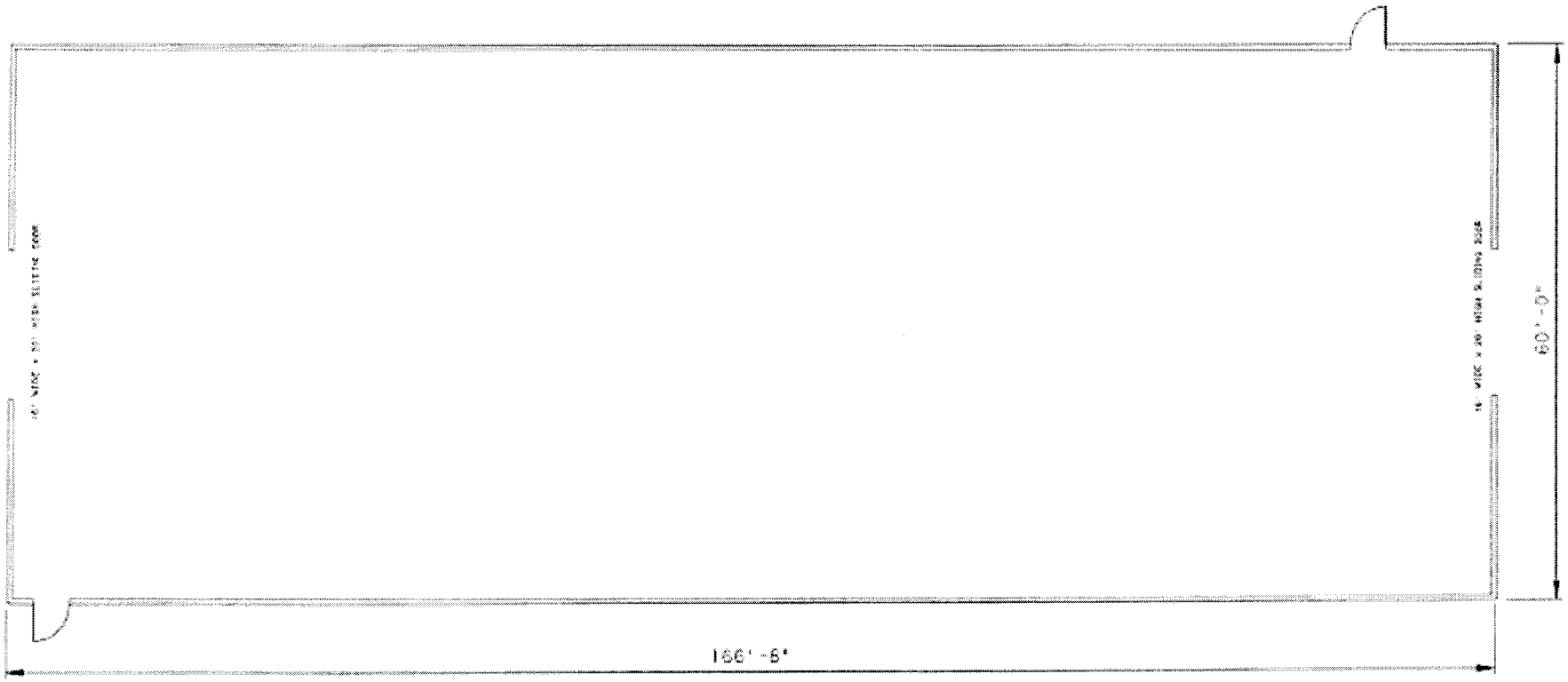
Harris RSGSF

PROJECT

Coastal Development Permit
DRC2004-00165

EXHIBIT

Typical Warehouse



FABRICATION, MOCK-UP & WELD TEST FACILITY PLAN

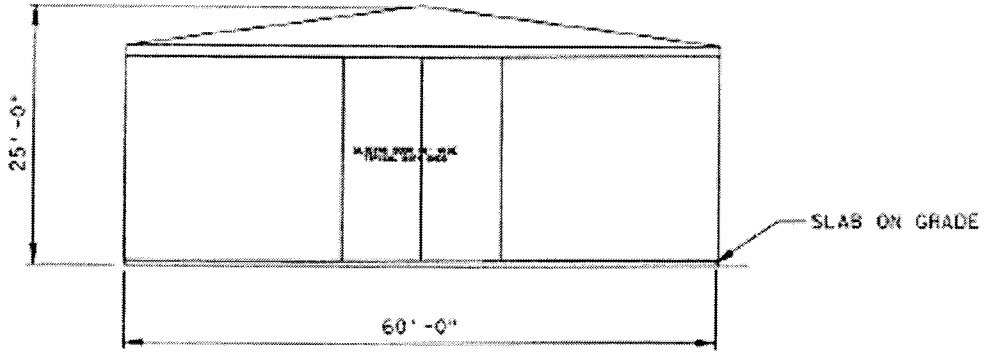
10,000 SQ.FT.

PROJECT

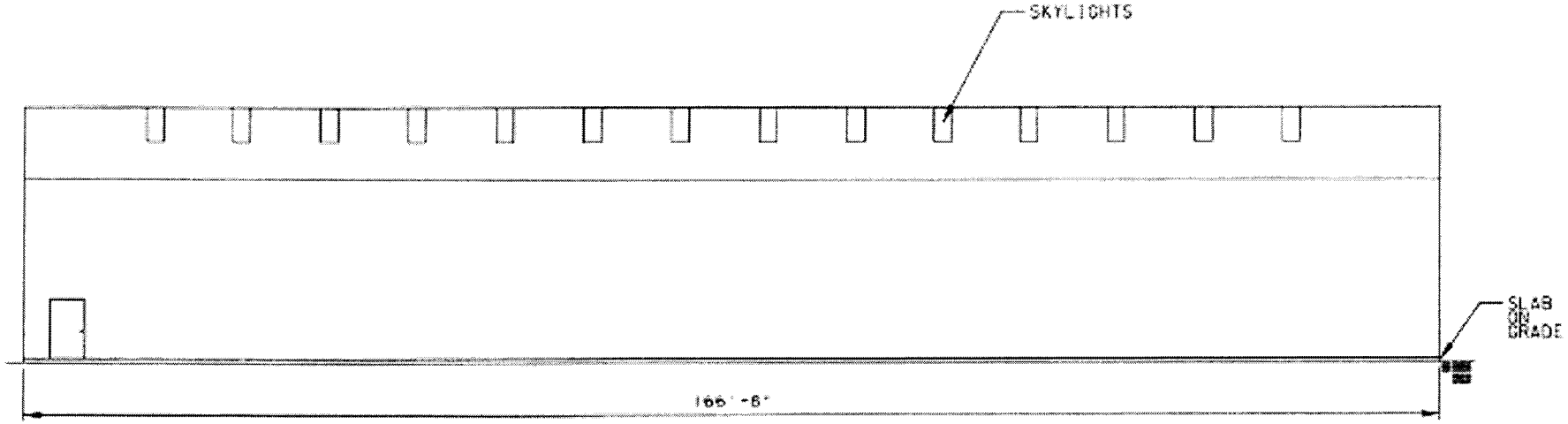
Coastal Development Permit
DRC2004-00165

EXHIBIT

Fabrication, Mock-Up, & Weld Test Facility:
Floor Plan



END ELEVATION



SIDE ELEVATION

C-21

PROJECT

Coastal Development Permit
DRC2004-00165

EXHIBIT

Fabrication, Mock-Up, & Weld Test Facility:
Elevations

SAN LUIS OBISPO COUNTY DEPARTMENT OF BUILDING AND PLANNING

Oconee Welder Qual Fac. / Fab. Shop

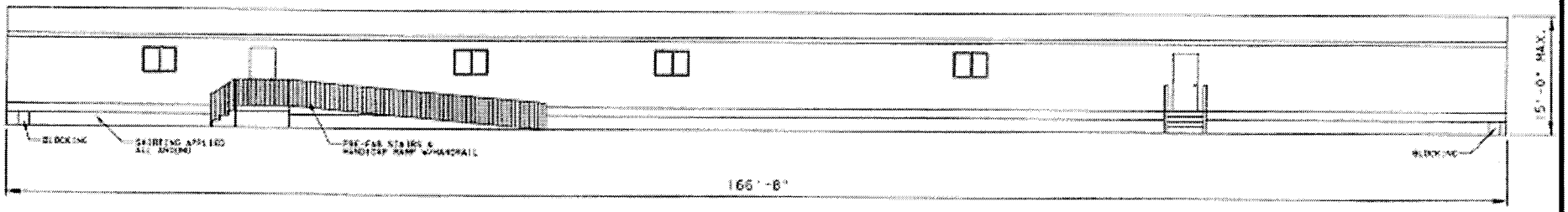
A2-1

PROJECT

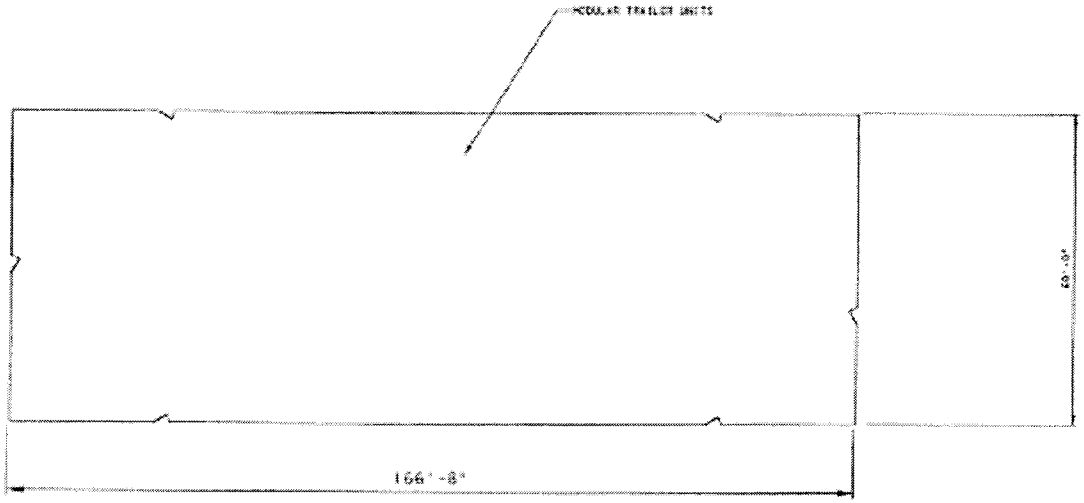
Coastal Development Permit
DRC2004-00165

EXHIBIT

Typical Fabrication Building

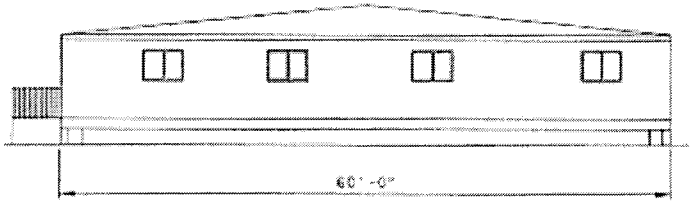


CONTRACTOR OFFICE SIDE ELEVATION



CONTRACTOR OFFICE PLAN

10,000 SQ.FT.



CONTRACTOR OFFICE END ELEVATION

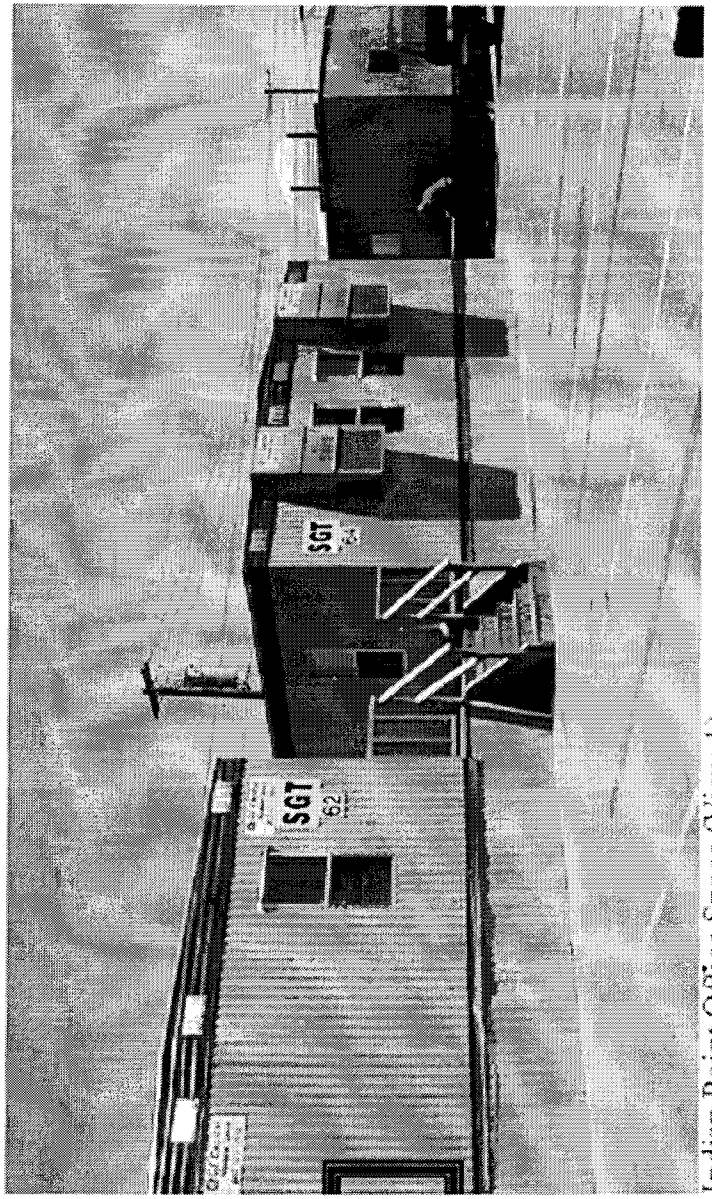
1-29

PROJECT

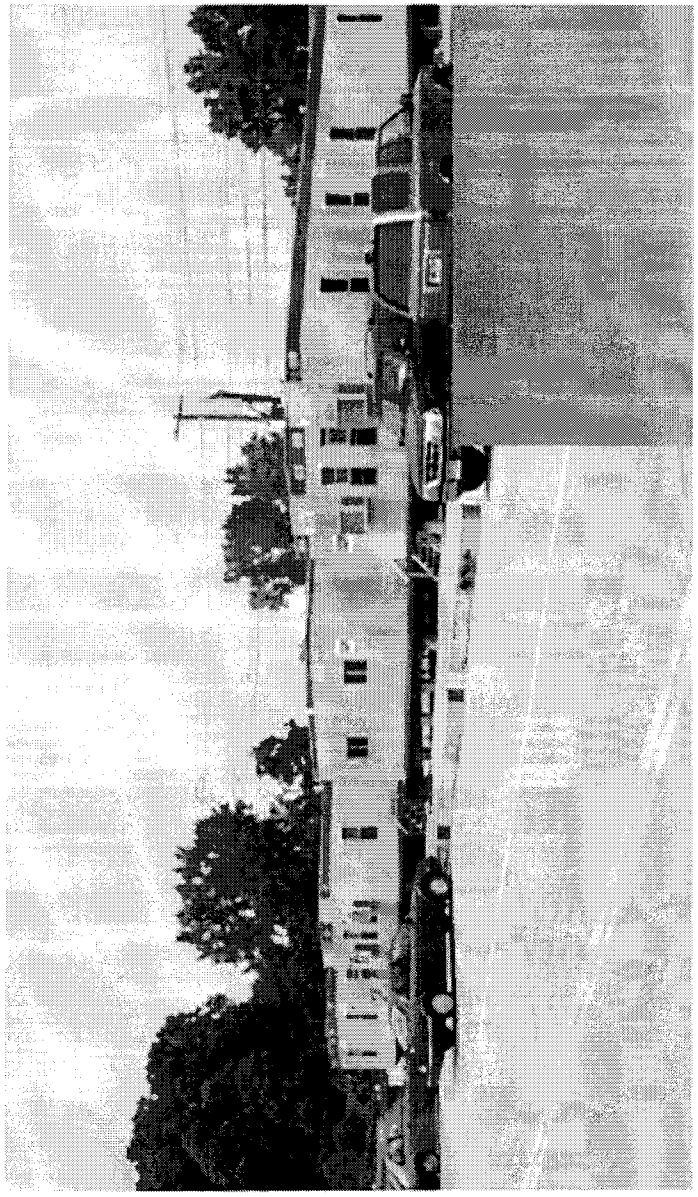
Coastal Development Permit
DRC2004-00165

EXHIBIT

Contractor Office Space Floor Plan & Elevations



Indian Point Office Space (View 1)



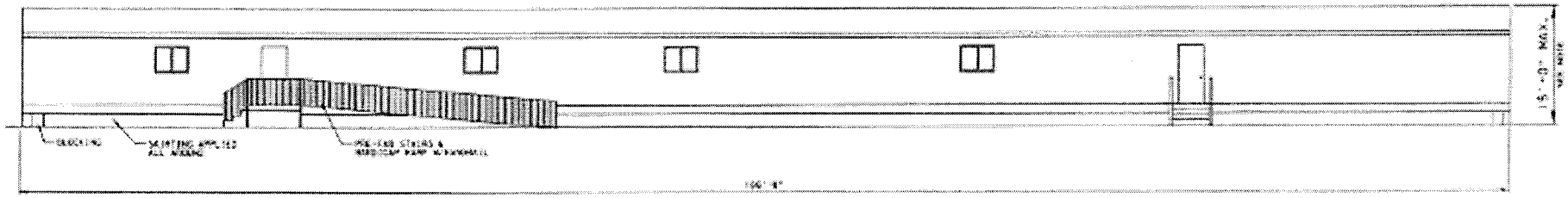
Indian Point Office Space (View 2)

PROJECT

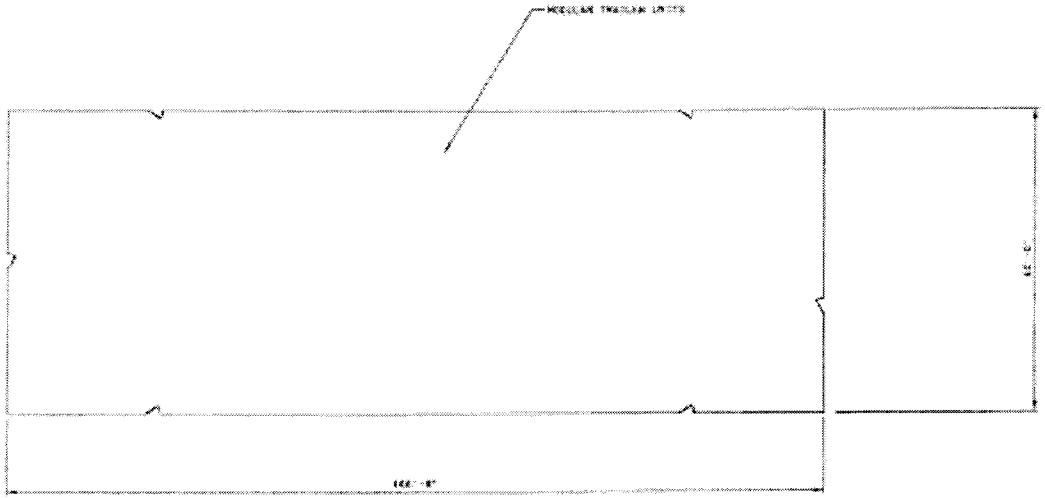
Coastal Development Permit
DRC2004-00165

EXHIBIT

Typical Office Space

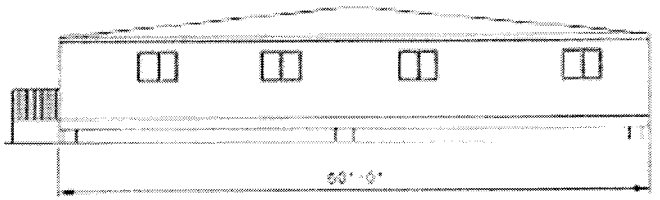


CONTAINMENT ACCESS FACILITY SIDE ELEVATION



CONTAINMENT ACCESS FACILITY PLAN

10,000 SQ.FT.



CONTAINMENT ACCESS FACILITY END ELEVATION

NOTE:
ALTERNATE DESIGN:
2 STORIES,
5,000 SQ.FT. FOOTPRINT
HEIGHT = 30' MAX.

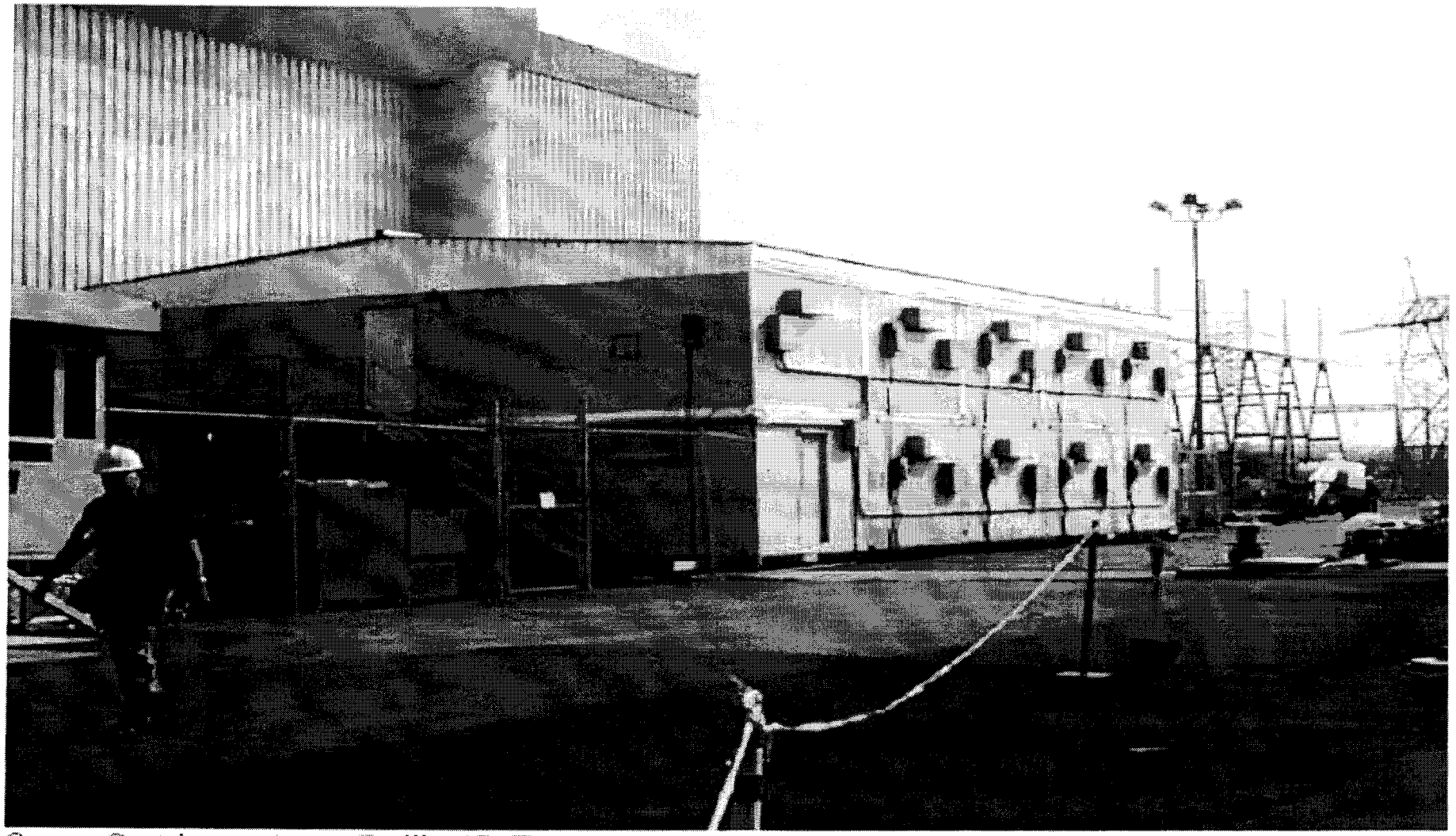
I-31

PROJECT

Coastal Development Permit
DRC2004-00165

EXHIBIT

Containment Access Facility Floor Plan & Elevations



Oconee Containment Access Facility (CAF)

PROJECT

Coastal Development Permit
DRC2004-00165

EXHIBIT

Typical Containment Access Facility

1-33

EXHIBIT A - CEQA FINDINGS

I. Environmental Determination

The Planning Commission of the County of San Luis Obispo considered and relied on the Final Environmental Impact Report (State Clearinghouse Number 2004101001) for the proposed Diablo Canyon Power Plant Steam Generator Replacement Project (the "Proposed Project") that was certified by the California Public Utilities Commission (CPUC), the Lead Agency, on November 18, 2005. The Final EIR consists of the Draft EIR, the Responses to Comments on the Draft EIR, a list of persons and agencies commenting on the Draft EIR, the Mitigation Monitoring Program, these Findings of Fact, the Staff Reports and any associated attachments (collectively referred to as the Final EIR), and finds that it has been completed in compliance with the California Environmental Quality Act (Public Resources Code Section 21000, et seq) (CEQA), and that the Planning Commission has received, reviewed and considered the information contained in the Final EIR, all hearings and submissions of testimony from officials of the CPUC, the public and other agencies and organizations. The Commission further finds that the Final EIR reflects the Lead Agency's independent judgment and analyses.

Having received, reviewed and considered the foregoing information, as well as any and all information in the record, the Planning Commission hereby makes these Findings of Fact pursuant to, and in accordance with, Section 21081 of the Public Resources Code, as follows:

II. Background

The Pacific Gas and Electric Company (PG&E) filed an application (Application Number A.04-01-009) with the California Public Utilities Commission (CPUC) on January 9, 2004 for the Diablo Canyon Power Plant Steam Generator Replacement Project (proposed project). The proposed project would replace the existing original steam generators (OSGs) at Diablo Canyon Power Plant (DCPP) Units 1 and 2; establish ratemaking for cost recovery of replacing these generators and allow PG&E to enter into long lead-time procurement contracts for the proposed project. The proposed project is composed of four major phases: (1) transportation of the replacement steam generators (RSGs) to DCPP; (2) staging and preparation of the RSGs; (3) removal, transport, and storage of the OSGs and (4) RSG installation.

PG&E's stated objectives for the proposed project are:

- Perform steam generator replacement on schedule to minimize the risk of forced outage or plant shutdown. Replacement of DCPP's aging steam generators may reduce the risk of leakage, a permanent forced outage, or frequent mid-cycle inspections and the associated temporary plant shutdown. In addition, this objective serves to minimize the overall reduction in electrical generation at DCPP from continuing operation with ongoing tube degradation.

- Reduce costs associated with tube degradation. The second objective of the proposed project is to operate DCPP in a cost-efficient manner by reducing costs associated with tube degradation, which is expected to increase over the next few years. Costs associated with tube degradation include increased maintenance costs, increased tube plugging, use of expensive sleeving, and loss of electrical generation.

- Ensure continued supply of low-cost power. Each DCPP Unit provides approximately 1,100 MW of low-cost, zero-emission power to the California power supply. This objective is intended to ensure that this supply of power remains available to California users until the end of the two current U.S. Nuclear Regulatory Commission (NRC) licenses for Unit 1 and Unit 2 (2021 and 2025, respectively).

- Perform steam generator replacement on a least cost schedule. Based on the current progression of tube degradation, the likelihood of a forced outage to replace the steam generators is substantially increasing, which in turn would increase the operating costs of DCPP. Replacing the steam generators according to the proposed schedule would ensure that such replacement is performed in the least cost manner.

The CPUC is the State Lead Agency responsible for compliance with the California Environmental Quality Act (CEQA). The Final Environmental Impact Report (EIR) was prepared by the CPUC in compliance with the State CEQA Guidelines and was published on March 21, 2005 with a 45-day comment period that ended on May 5, 2005. The Final EIR consists of two volumes and includes over 1,300 pages. Volume 1 (EIR) is re-printed from

the Draft EIR. Changes made to the Draft EIR are noted in Volume 1: inserted text is underlined and deleted text is shown in strikeout. Volume 2 consists of all comments on the Draft EIR and Responses to Comments. Over 520 pages of comments on the Draft EIR were submitted to the CPUC. Private citizens provided the majority of the comments during the scoping process. A total of 67 written and 54 verbal comments were received during the scoping process from State and County government agencies, a special district, non-profit organizations and concerned members of the public. In addition to comments from private individuals, the following government agencies submitted comments: California Public Utilities Commission Office of Ratepayer Advocates, California Coastal Commission, Port San Luis Harbor District, San Luis Obispo County Air Pollution Control District, San Luis Obispo County Department of Planning and Building and California Department of Forestry/San Luis Obispo County Fire Department. Comments were also received by the following community groups, non-profit organizations and companies: California Energy Markets, Citizens for Safe Access to Essential Services and Safe Milieus, Community Food System Project of San Luis Obispo County, Grueneich Resource Advocates (on behalf of: Mothers For Peace, Sierra Club, Public Citizen, Environment California and Greenpeace), Latham & Watkins (on behalf of PG&E), Life on Planet Earth, San Luis Obispo Green Party, San Luis Obispo Mothers For Peace, Sierra Club, Santa Lucia Chapter and Zero Tolerance for Denied Shelter.

This Final EIR discloses the environmental impacts expected to result from the construction and operation the proposed project and mitigation measures, which, if adopted by the CPUC or other responsible agencies, could avoid or minimize significant environmental effects. In accordance with the State CEQA Guidelines, the EIR also evaluates alternatives to the proposed project that could avoid or minimize significant environmental effects. The Final EIR provides a comparison of the environmental effects of the proposed project and the alternatives and identifies the environmentally superior alternative.

The DCPP Steam Generator Replacement Project EIR is an informational document and does not make recommendations regarding the approval or denial of the proposed project. The purpose of the EIR is to inform the public on the environmental setting and impacts of the proposed project and alternatives. The EIR will be used by the CPUC to conduct proceedings to determine whether to approve the proposed project. In addition to the CPUC using this EIR as part of their specific approval process, this document may also be used by Responsible Agencies, including the County of San Luis Obispo and Port San Luis Harbor District, as part of their respective discretionary actions and approval process.

III. The Record

The California Code of Regulations, Title 14, Section 15091 (b) requires that the Planning Commission's Findings be supported by substantial evidence in the record. Accordingly, the Final Environmental Impact Report (Volumes 1 and 2) for Pacific Gas and Electric Company's Application for the Diablo Canyon Power Plant Steam Generator Replacement Project (State Clearinghouse Number 2004101001) dated August, 2005, represents the primary source of this substantial evidence in the record. Copies of the document are available from the State of California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102-3298. Additional documents consulted included matters of common knowledge to the Planning Commission such as the County General Plan, the Land Use Element and Coastal Zone Land Use Ordinance, the California Environmental Quality Act (CEQA) and the State CEQA Guidelines implementing the Act.

IV. Final Environmental Impact Report

The Planning Commission of the County of San Luis Obispo makes the following Findings with respect to the August, 2005 Final Environmental Impact Report for the Diablo Canyon Power Plant Steam Generator Replacement Project.

A. The Planning Commission has reviewed and considered the following documents: Aspen Environmental Group, August 2005 Final Environmental Impact Report for the Diablo Canyon Power Plant Steam Generator Replacement Project.

B. The Planning Commission has considered the information contained in the August, 2005 Final Environmental Impact Report for the Diablo Canyon Power Plant Steam Generator Replacement Project, the public comments and responses previously submitted and the public comments and information presented at the public hearings.

C. All information was considered by the Planning Commission before taking an action on the project.

D. The Planning Commission hereby finds and determines that implementation of the proposed project will not have a significant adverse effect on the environment.

E. The Planning Commission hereby finds with respect to the adverse environmental impacts detailed in the Final EIR:

1. Based on information set forth in the Final EIR, the Findings of Fact, the mitigation measures included within the Mitigation Monitoring Program, the Planning Commission finds and determines that changes or alterations have been required in or incorporated into the project which avoid or substantially lessen the adverse environmental effects identified in the Final EIR for the following issues:

   Air Quality
   Biological Resources
   Cultural Resources
   Geology, Soils and Paleontology
   Hazardous Materials
   Hydrology and Water Quality
   Land Use, Recreation and Agriculture
   Noise and Vibration
   Public Services and Utilities
   System and Transportation Safety
   Traffic and Circulation
   Visual Resources

2. That, based on information set forth in the Final EIR and in the Findings of Fact, the proposed project with implementation of proposed mitigation measures does not create any significant effects which cannot be reduced to a level of insignificance.

3. That no additional adverse impacts will have a significant effect or result in substantial or potentially substantial adverse changes in the environment as a result of the proposed project.

F. The Planning Commission hereby finds and determines that:

1 All significant effects that can be feasibly avoided have been eliminated or substantially lessened as determined through the Findings set forth in Section VI.;

2 The project design and operation incorporates adequate measures to ensure protection of significant environmental resources.

3 Based on the Final EIR and the Findings of Fact and other documents in the record, specific economic, social and other considerations make infeasible other project alternatives identified in the Final EIR and

4 Should the final design of the proposed project have the potential to result in adverse environmental impacts that are not anticipated or addressed by the August, 2005 Final EIR, subsequent environmental review shall be required in accordance with CEQA Guidelines Section 15162(a).

IMPACT ANALYSIS: Four categories of impacts are identified:

Class I. Class I impacts are significant and unavoidable. To approve a project resulting in Class I impacts, the CEQA Guidelines require decision makers to make findings of overriding consideration that "... specific legal, technological, economic, social, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR...".

Class II. Class II impacts are significant but can be mitigated to a level of insignificance by measures identified in this EIR and the project description. When approving a project with Class II impacts, the decision-makers must make findings that changes or alternatives to the project have been incorporated that reduce the impacts to a less than significant level.

Class III. Class III impacts are adverse but not significant.

Class IV. Beneficial impacts.

V. Potential Environmental Effects Which Are Not Significant

The Planning Commission has concluded that the following effects are not considered significant (Class III Impacts).

Biological Resources

Impact B-1: Transport of the Replacement Steam Generators would temporarily disturb nocturnal wildlife as a result of increased noise and night lighting along the road. Refer to the Final EIR page D.3-30.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Although the DCPP Access Road is regularly traveled by passenger vehicles and tractor trailer trucks, the type of equipment used for transport of the RSGs could temporarily disturb nocturnal wildlife if the RSGs were transported at night. Headlights on the transporter and other prime movers may cast light over a larger area than typical vehicles using the road, and this light may be more intense.

However, speeds would be well below the posted speed limit of the paved road minimizing adverse noise impacts (no more than ten miles per hour). No transport activities are expected to occur off the paved road, and no vegetation is expected to be impacted during transport. Because the transporter and other prime movers would be limited to a total of 16 trips between Port San Luis and DCPP, this impact is not considered significant and no mitigation is required.

Impact B-2: Surface water runoff associated with new construction required to reinforce portions of the RSG transport roadway would increase erosion and sediments affecting aquatic species. Refer to the Final EIR page D.3-31.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Because the road is completely paved, impacts related to runoff, erosion and sedimentation along the transport route would be relatively minor. In addition, any areas to be reinforced would be relatively small and applicant-proposed monitoring and erosion control BMPs are expected to be adequate to address small areas where erosion could be a concern. This impact is considered less than significant and no additional mitigation measures are required.

Impact B-4: Offloading activities would disturb nearshore marine habitats. Refer to the Final EIR page D.3-33.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: The direct mechanical disturbance of nearshore marine habitats associated with RSG barge offloading activities can result in the loss of invertebrate marine organisms. Barge offloading activities associated with the proposed project can disturb beach habitat in two ways. First, grading of surficial sand cover to install the barge offloading crane would destroy marine invertebrates and result in a temporary delay in habitat recolonization. Second, regions immediately surrounding barge offloading area would be physically modified and compacted by the use of heavy equipment.

Damage to the marine invertebrate community from physical disturbance of habitat would be adverse but not significant for three reasons. First, the beach area impacted by habitat disturbance will be limited to the region surrounding the barge offloading area. Second, the number and biomass of invertebrate organisms lost would be comparatively low and represent only a few species which are not considered rare or endangered. Finally, loss of these organisms would probably be unavoidable, and the invertebrate community would fully recover within a few months after the completion of the project. Therefore, potential impacts are considered adverse but not significant and no mitigation is necessary.

Hazardous Materials

Impact H-4: Previously unknown asbestos or lead could be encountered. Refer to the Final EIR page D.6-18.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Existing asbestos and lead surveys cannot identify all asbestos- or lead-containing materials, especially in or on internal building components. During OSG removal and other construction activities, previously unknown ACM, ACCM and/or LCP hazards may be encountered. Compliance with Federal regulations to survey prior to demolition or renovation activities (NESHAPs) would ensure that this impact would be less than significant.

Land Use, Recreation and Agriculture

Impact L-1: Transport would disrupt an established land use. Refer to the Final EIR page D.8-26.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Offloading Steam Generators at Port San Luis would affect Port San Luis for up to four days, from initial offloading through optional temporary storage to departure onto the DCPP Access Road. However, because Port San Luis is an active port, offloading activities would be consistent with the intended uses of Port San Luis. While vessels moored along the barge route may be temporarily relocated within the harbor, such relocation efforts would not substantially affect these vessels' use of the harbor. Temporary staging and storage of the RSGs at Port San Luis could temporarily disrupt commercial or recreational uses at Port San Luis. However, due to their temporary nature, potential staging and storage associated with RSG transport activities would have less than significant impacts to established land uses at Port San Luis.

After leaving the Port, the RSGs would travel along Avila Beach Drive to the existing DCPP Access Road, which was specifically constructed to support heavy equipment and loads, and has been utilized for this purpose on various occasions since the initial construction of DCPP. Traveling at speeds of 3 to 10 miles per hour, the transporter would complete each trip (eight total) in approximately one to two hours. Due to the short duration of transport, the passage of the transporter along the existing access road would not disrupt adjacent land uses significantly. RSG transport impacts on established land uses would, therefore, be less than significant

Noise and Vibration

Impact N-1: Offloading would temporarily increase local noise levels near sensitive receptors. Refer to the Final EIR page D.9-6.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Offloading and transport-related activities would increase noise levels temporarily for receptors near Port San Luis and the DCPP Access Gate. Relatively steady operation of the tugboats and lifting equipment would need to occur while the barge and push boats are landed at the shore. The temporary passing of transporters and work crews during each steam generator transport trip would temporarily increase the noise levels along Avila Beach Drive by about 7 to 10 dBA. This could create a short-term nuisance for residents of the Port San Luis Trailer Park and Harbor Terrace area. The relatively steady operation of tugboats and other offloading equipment at Port San Luis could also create a short-term nuisance for residences and recreational users of Port San Luis. This nuisance would be exacerbated by pure tones, such as backup signals, which can be audible over other background noise, especially at night. The noticeable noise increase above ambient levels would be a potentially significant short-term impact because of the likelihood of disrupting noise sensitive uses. However, because the County Noise Element and Noise Ordinance do not address short-term nuisances and exempt noise from utility work, these noise levels would not exceed any established standards. Coordinating with the noise sensitive land uses would reduce the impact to a less than significant level by providing adequate advance notice of the transport schedule and making a public liaison available to the affected persons in the area.

Impact N-2: Increased traffic during the steam generator replacement project would expose sensitive receptors along Avila Beach Drive and San Luis Bay Drive to increased noise. Refer to the Final EIR page D.9-8.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Project commuter, equipment and material trips would temporarily raise noise levels along Avila Beach Drive and San Luis Bay Drive. During the peak activity for removal, transportation, and storage of the OSGs, approximately 900 project workers would need to travel to DCPP on a daily basis. The applicant expects that the workers would be split into two shifts and that vehicle occupancy would be about 2.0 workers per car. This means that during shift changes, peak hour traffic caused by the project workers would cause approximately 450 additional auto trips per hour to local streets. Additional noise would

occur from trucks carrying construction materials and other project support traffic. Existing peak hour traffic levels are above 600 vehicles per hour for the main access route, Avila Beach Drive. Noise increases associated with project traffic would be approximately 2.5 dBA during this phase of peak project traffic. This traffic would temporarily, but not substantially increase noise levels along Avila Beach Drive and San Luis Bay Drive.

Public Services and Utilities

Impact U-1: Disruption of utility systems. Refer to the Final EIR page D.10-7.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Staging and preparation activities would occur within the DCPP site on the terrace south of the DCPP Access Road or adjacent to the containment facilities. Although most activities associated with staging and preparation (e.g., processing RSG personnel, training, and management activities) would not disrupt utility systems, construction of the temporary structures required for this phase could potentially result in utility system impacts. A number of temporary structures would be constructed including a RSG storage facility, temporary warehouse and laydown area, personnel training and mock-up facilities, office and subcontractor facilities, a containment access facility and possibly a decontamination facility. The containment, access and decontamination facilities would be constructed adjacent to the power plant, while the other temporary facilities would be constructed south of the DCPP Access Road. Although no major excavation is planned for construction of these facilities, trenching and excavation to run utilities to these temporary buildings could accidentally damage other subsurface utilities such as telecommunications lines or buried pipelines on the DCPP site. Damage to these systems could result in telecommunications, water, or gas outages for users onsite. The applicant is required by State law to manually probe for existing utilities prior to excavation. Compliance with State law would ensure that subsurface utility disruption impacts would be less than significant.

Impact U-2: Obstruction of Emergency Access. Refer to the Final EIR page D.10-8.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Fire protection or other emergency services could be required at staging and preparation sites in the event of an accident. Because staging and preparation activities would comply with the applicant's existing safety procedures, programs, and plans, the likelihood of an accident requiring such a response would be low. Access roads to the temporary facilities used in staging and preparation would comply with CDF/San Luis

Obispo County Fire Department Road Standards. With the implementation of these procedures and programs, staging and preparation is not expected to restrict access to fire, security/police, other emergency services, or any other public service systems. Any impacts resulting from disruptions to public service systems by staging and preparation activities would be less than significant.

Staging and preparation would require between 100 and 700 temporary workers. Traffic would be substantially increased with these additional workers, but with the implementation of best management practices (BMPs) for traffic and transportation, it is not anticipated that this increase would be great enough to create conditions which would restrict access to emergency vehicles either within the DCPP site or surrounding communities. It is not expected that the temporary population increase in nearby towns due to the influx of out-of-area workers for the project would disrupt fire or police protection services, or other public services such as schools. Any impacts would be less than significant.

Impact U-3: Utility and Public Service Demand. Refer to the Final EIR page D.10-8.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: The utility and public service requirements for staging and preparation activities on the DCPP site would be within the capacities of DCPP's existing service providers. During construction of the temporary facilities, approximately 15,000 gallons of water per day would be required for dust suppression during trenching and excavation or other earth-moving activities. Other staging and preparation activities would require water for cleaning equipment and drinking water for crews. With over 1.2 million gallons of water per day available to DCPP, these requirements would be well within the capacities of DCPP water supplies. Waste from staging and preparation activities would largely be generated in the form of scrap wood and metal, packing crates and packing material, construction debris, and other general trash. These materials would be disposed of by South County Sanitation and Coastal Roll-Off.

Staging and construction preparation activities would not be anticipated to substantially increase stormwater runoff as all new temporary facilities would be placed on existing developed or disturbed land. Any increases in the area of impervious surfaces onsite would be relatively minor. Wastewater and sewage generated by crews could increase between 3,000 and 11,000 gallons per day, which would be well within the DCPP wastewater plant's designed capacity of approximately 40,000 gallons per day. The remaining sludge would be removed and taken offsite by Speeds, Inc. Construction activities, particularly with the implementation of existing safety plans and programs, are not anticipated to include any activities that would exceed the capacities or capabilities of emergency service providers for DCPP. Temporary structures would be built according to all applicable codes and standards,

including those requiring appropriate sprinklers, alarms, fire flow, and hydrant systems where necessary. Staging and preparation activities would have a less than significant impact on the capabilities and capacities of existing utility and public service providers.

While some of the temporary employees required for staging and preparation would commute from their permanent residences to the project, many workers would stay in temporary accommodations in nearby cities and towns. It is not anticipated that the temporary population increase associated with staging and preparation would require the addition of any new housing. As workers would be staying in existing accommodations, the existing utilities and public service systems have the capacity to accommodate the demands of this temporary population increase.

It is not expected that the project would increase the demands on schools in the surrounding area. Although the temporary increase in population would result in a greater demand for fire or police protection services, it is not anticipated that a temporary population increase of 700 or fewer residents would substantially increase demand. Any impacts to utilities or public services due to increased demand from the temporary workers could be adverse, but would be less than significant.

Socioeconomics

Within the area of Socioeconomics, the Final EIR discussed the potential impacts of the proposed project upon population growth, housing and labor demand and population and housing displacement. In all three cases, no potential environmental impacts were identified. The basis for this conclusion of not project impact is noted below.

Findings:

Population Growth

Transport of the RSGs would not result in population increase. Transport of the RSGs would require approximately 30 personnel for a period of 2 to 4 days during each year of deliveries (2007 and 2008). Due to the specialized nature of the transportation, it is anticipated that personnel would come from outside the two-hour commute area. It is expected that these workers for the transport phase would not stay for the duration of the entire proposed project. Any population increases due to workers coming from outside the commute area would be temporary. Therefore, there would be no permanent change to existing or future population growth levels as a result of offloading and transport activities. No impact would occur.

Staging, preparation and construction of the RSG storage facility would require between 100 and 700 employees. As the steam generator replacement is scheduled to occur at the same time as the refueling and maintenance outage, the workers required for the steam generator replacement would be in addition to the 1,285 temporary workers required for the refueling outage. A small portion of these employees may be PG&E employees. The employees for

staging and preparation activities would be needed for a period of 4 to 6 months (September to November 2007 through February 2008 in the case of Unit 2 and August to November 2008 through January 2009 for Unit 1) in addition to the duration of the generator replacement activities following staging and preparation. Although there would be approximately three months between the completion of activities in Unit 2 and the initiation of staging and preparation for Unit 1, personnel working on both projects could potentially remain in the area for over 18 months. It is anticipated that portions of the personnel would be drawn from the two-hour commute area described above. The remaining required personnel would be recruited from other parts of North America. It is expected that any workers from outside the commute area would stay only for the duration of the proposed project and that no permanent change to population would occur. No impact would occur.

Activities associated with OSG removal, transportation and storage are expected to require approximately 900 employees in addition to the 1,285 temporary workers required for the refueling outage. A small portion of these employees may be PG&E employees. These employees would be needed for up to four months for each unit (February 2008 to May 2008 for Unit 2 and January 2009 to April 2009 for Unit 1). As described above for staging and preparation, personnel could potentially remain in the area during the break between refueling outages for Units 2 and 1 and could stay in the area for up to 18 months. As with staging and preparation, it is expected that any workers from outside the commute area would stay only for the duration of the proposed project and that no permanent change to the area's population would occur. No impact would occur.

Housing and Labor Demand

Approximately 30 RSG offloading and transport laborers may need to temporarily relocate to the project area. There is an adequate amount of vacant housing in the area. Therefore, demand for new housing is unlikely. Since transportation would take only 2 to 4 days per year, temporary accommodations would be available at the hotels and motels in the area. As a result, the project would not lead to construction of any new homes, businesses or infrastructure as a result of the demand for labor.

Replacement steam generator offloading and transport would require specialized, skilled positions contracted through a specific heavy transport company. Approximately 30 personnel would be required for up to 4 days for each of the unit deliveries. A small portion of these workers may be PG&E employees. Counties within a two-hour commute range contain a skilled labor force with a sizable transportation workforce that would be able to meet labor needs for RSG offloading and transport. Given the substantial number of transportation workers within the commute area, RSG offloading and transport would not induce a substantial demand for labor. No impact would occur.

Some of the workers required for staging and preparation would be from outside the two-hour commute range, and would require temporary housing accommodations. Although this would temporarily induce a demand for housing, the area has a strong vacancy rate and

capacity for accommodating temporary populations. The large numbers of hotels, motels, and camping areas would accommodate the housing needs of temporary workers. Additionally, both Pismo Beach and Morro Bay have large percentages of vacant units that are primarily used for seasonal, recreational or occasional use. The vacancy rates of Morro Bay, Pismo Beach and the other locations indicate that approximately 11,600 housing units are vacant and could potentially be used by temporary workers. Temporary housing in the areas surrounding DCPP would be able to accommodate the temporary workers required for project activities as well as temporary workers required for refueling outage activities during off peak tourist periods. No construction of new homes, businesses, or infrastructure would occur as a result of the demand for labor. No impact would occur.

Staging and preparation would induce a demand for skilled or semi-skilled labor positions, including general construction labor for construction and preparation of the RSG storage facility, temporary warehouse and laydown area, personnel training and mock-up facilities, office and subcontractor facilities, containment access facility, and the decontamination facility. Nuclear industry construction specialists would also be required for preparing and training for the replacement of the steam generators and storage of the OSGs. Construction laborers and required specialists can generally be drawn from the workforce within the two-hour commute range. San Luis Obispo and its surrounding counties contain a sizable construction labor force that provides adequate and available workers to accommodate the project. Even if all 700 employees required for staging and preparation would be drawn from the surrounding area, they would represent only 1.7 percent of the total construction workers in the area. Therefore, there would not be a substantial demand for labor resulting from project-related staging and preparation activities. No impact would occur.

Some of the 900 workers required for OSG removal, transportation, and storage would be drawn from within the two-hour commute range, while others from outside the area would require temporary accommodations. As described above, the area surrounding DCPP has a substantial capacity for accommodating temporary populations with a large number of hotels, motels, and camping areas. Similarly, approximately 11,600 vacant housing units in the surrounding area would be available for temporary workers. Temporary housing in the areas surrounding DCPP would be able to accommodate the temporary workers required for project activities, and no construction of any new homes, businesses, or infrastructure would occur as a result of project-related workers. No impact would occur.

OSG removal, transportation, and storage would induce a need for primarily skilled positions, although some semi-skilled positions may be required for construction of the OSG Storage Facility. Nuclear industry construction specialists would be required for the OSG removal, staging, and storage. Construction laborers and any required specialized labor can generally be drawn from the workforce within the two-hour commute range. San Luis Obispo and its surrounding counties contain a sizable construction labor force that would accommodate the project's demand for labor. Even if all 900 employees required for OSG removal, transportation, and storage were to be drawn from the surrounding area, they would

represent approximately 2.3 percent of the total construction workers in the area. Therefore, there would not be a substantial demand for labor. No impact would occur.

Population and Housing Displacement

Land uses near the offloading location at Port San Luis and along the transport route are primarily open space and agriculture within the DCPP owner-controlled area (OCA), with recreation and commercial uses at Port San Luis. No housing or residential areas would be displaced by transportation of the RSGs. A recreational vehicle camping area with a maximum 14-day stay is located at Port San Luis. Offloading activities at Port San Luis would occur for approximately two to four days, once between September and November of 2007 and once between September and November of 2008, at night, and outside the tourist season. Any necessary staging of the RSGs at Port San Luis would occur outside of County road ROWs, allowing for continued access to the Port. However, the timing of offloading activities should minimize the impact of disruptions to Port San Luis businesses and fishermen. The transport route would not require the removal or relocation of any residential units or business uses, and no people or businesses would be displaced. No impacts would occur.

Temporary facilities to be constructed within the proposed TSA would be built on existing developed and disturbed property onsite (on the terrace south of the Access Road) and so would not displace any people or existing housing. Temporary workers from outside the area could potentially increase competition for hotels, motels, or short-term housing. As only approximately 100 workers would be required at the beginning of staging and preparation for Unit 2, beginning as early as September 2007, it is unlikely that temporary housing of these workers would conflict with demand for housing by tourists. Since the largest workforce would be needed in the fall and winter when tourism declines, an increased number of workers requiring temporary housing would not increase competition for temporary accommodations.

If temporary workers were to remain in the area between the completion of project activities on Unit 2 and the initiation of staging and preparation for Unit 1, there could be a potential increase in the need for temporary housing and accommodations. As described above, the cities and communities surrounding the project area have a substantial amount of temporary housing in the form of hotels, motels, campgrounds, and seasonal housing. The surrounding area is estimated to have approximately 11,600 vacant housing units. Workers staying through the summer of 2008 could potentially increase competition for temporary housing with summer visitors to the area. However, given the abundant temporary housing available in the area, no substantial displacement of people or businesses would occur, and no new housing would need to be constructed. No impact would occur.

The OSG Storage Facility to be constructed as a part of this phase would be built on existing developed and disturbed property onsite. The proposed project would not displace any people or existing housing. As described for staging and preparation, temporary workers

from outside the area could potentially increase competition for hotels, motels, or short-term housing. However, the cities and communities surrounding the project area have a substantial amount of temporary housing in the form of hotels, motels, campgrounds, and seasonal housing to accommodate workers. No substantial displacement of people or businesses would occur, and no new housing would need to be constructed. No impact would occur.

The labor force for steam generator installation and return to service phase of the project would be the same total labor force identified for OSG removal, transportation, and storage because many of the activities in these two phases would be occurring at the same time. Consequently, the socioeconomic impacts from these activities would be similar to those identified for the previous phases.

System and Transportation Safety

Impact S-3: Residual contamination would be present on the OSGs with the potential for radiation exposure during removal and transport. Refer to the Final EIR page D.12-23.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Potential radiation exposures would be managed in a manner that maintains personnel radiation doses in accordance with the existing DCPP Radiation Protection Program. DCPP's ALARA program complies with the requirements of 10 CFR 20 (Radiation Protection Program) and 10 CFR 50 (Domestic Licensing of Production and Utilization Facilities [for nuclear facilities]). The ALARA program is implemented through PG&E Nuclear Power Generation (NPG) program directives, administrative procedures, and working level procedures. A detailed ALARA plan is maintained by PG&E and periodically reviewed by the NRC during the normal course of the NRC license and requirements. During the Proposed Project, the ALARA plan would be modified as necessary to address shielding and source removal. This plan modification would be included as part of the radiation work permit used to control radiation exposure to OSG removal workers. A radiation work permit is issued by the DCPP RadiationProtection Manager prior to any activity that could result in radiation exposure. Compliance with these regulations and with the ALARA and radiation work permit are required by Federal law. Modeling results indicate that the potential for adverse offsite impact is minimal. Worst-case modeling indicated a proposed project–related total exposure of 0.003 mrem at the DCPP control area boundary and 1.4 x 10-5 mrem at Avila Beach. These worst-case exposure levels are well below the most stringent public exposure limit of 10 mrem/year. Therefore, potential impacts associated with the removal and transport of the OSGs to the proposed onsite storage facility are considered less than significant.

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Impact S-4: An aircraft accident could result in damage to the OSG Storage Facility with a subsequent release of radioactive material. Refer to the Final EIR page D.12-25.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Storage of the OSGs onsite would occur in a new facility designed to minimize the release of radioactive material. The most potentially damaging accident scenario that could compromise the integrity of the OSG Storage Facility is presumed to be an unintentional impact by aircraft. Taking into account the proximity of surrounding airports, established flight paths, and the number of flights in nearby corridors, the probability of an inadvertent aircraft strike on the OSG Storage Facility would be less than the threshold of one in one million per year (1 x 10-6/year). Although an inadvertent aircraft strike would be improbable, the potential consequences are summarized below.

The consequences of an inadvertent aircraft strike on the proposed OSG Storage Facility were evaluated using the dispersion modeling methodology, with the exception that more radiation would be released in any fire that would occur subsequent to aircraft impact, and the resulting plume would be thermally buoyant. Given the large thermal plume rise, worst-case concentrations would occur on the hillsides surrounding the DCPP, with a maximum expected event dose of 4 mrem, and a maximum offsite dose of 1.4 mrem. These dosages conservatively assume that individuals would remain in the area during the duration of a fire and would also be exposed to substantial amounts of smoke. Comparable normal exposure values would be 20 mrem for normal background radiation and 20 mrem for a chest X-ray. These worst-case exposure levels are lower than acceptable exposure limits of 10 mrem per year for normal operations, and substantially lower than acceptable levels for one-time exposure accidents of 5 rem (5,000 mrem). Therefore, impacts associated with an inadvertent aircraft strike on the OSG Storage Facility and subsequent catastrophic loss of containment are less than significant.

Impact S-6: A terrorist attack could result in damage to the OSG Storage Facility with a subsequent release of radioactive material. Refer to the Final EIR page D.12-25.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: The analysis for an accidental aircraft strike on the OSG Storage Facility assumed worst case conditions with consequences similar to a willful terrorist attack on the OSG Storage Facility. Thus, although impacts associated with a potential terrorist attack on the OSG Storage Facility could affect PG&E and ratepayers, potential safety risks

would be considered less than significant.

Visual Resources

Impact V-2: Short-term visibility of RSGs and transporters to other viewers along access route west of the Access Gate. Refer to the Final EIR page D.14-23.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Potential viewers of RSG transport operations west of the Access Gate are presumed to be PG&E employees, project-related workers, or ranchers involved in lease grazing activities. Because of the work-oriented nature of all these activities, viewer concern with project-induced visual change is assumed to be low. Overall sensitivity of these views is considered low and thus impacts are considered to be less than significant.

Impact V-3: Short-term visibility of steam generators and transporters to viewers at DCPP. Refer to the Final EIR page D.14-24.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Potential viewers of RSG transport operations at the DCPP site would be PG&E employees or other project-related workers. Because of the work-oriented nature of all activities at DCPP, viewer concern with project-caused visual change is assumed to be low. Within DCPP, the existing industrial character of the facility compromises existing visual quality. Overall sensitivity of all these viewers is considered low and thus impacts are considered to be less than significant.

Impact V-4: Short-term visibility of steam generators and transporters to recreational boats. Refer to the Final EIR page D.14-24.

Mitigation: None.

Findings: Insignificant

Supportive Evidence: Viewers on recreational boats within San Luis Obispo Bay and off the coast are assumed to be essentially similar to those of other viewers in the remainder of the bay viewshed. Various phases of the RSG transport operations could be visible to one degree or another from boats off the coast between DCPP and Point San Luis. From viewpoints off the coast at typical distances from shore, the project components would

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appear visually subordinate, or less prominent than the existing facilities with similar visual character, and would represent weak to moderate levels of contrast. Overall visual sensitivity of boaters in open water off the coast is considered to be low to moderate because RSG transport would be viewed in motion and would be of a very short-term nature. The views would be a one-time occurrence for most or all viewers and would not strongly interfere with recreational boating activities. Thus, impacts would be less than significant.

VI. Potential Significant Effects Which Have Been Mitigated to A Level of Insignificance

The Planning Commission has concluded that the mitigation measures identified in the Mitigation Monitoring Program (Section IX.) will result in substantial mitigation of the following effects and that these effects are not considered significant or they have been mitigated to a level of insignificance.

Air Quality

Impact A-1: Replacement activities would cause emissions from transport and construction equipment. Refer to the Final EIR page D.2-7.

Mitigation A-1a: Develop and implement a trip reduction plan. PG&E shall develop and implement a Trip Reduction Plan in cooperation with the SLOAPCD and CPUC to provide emission and congestion benefits for the duration of the steam generator replacement project. The goal of the plan shall be to achieve an average project-worker vehicle trip reduction of 50 percent as established by Mitigation Measure T-3a. The plan shall be approved by the SLOAPCD and CPUC at least 60 days before commencement of transport or construction activities.

Mitigation A-1b: Develop and implement a diesel combustion emission control plan. PG&E shall develop and implement a Diesel Combustion Emission Control Plan to implement the SLOAPCD recommendation of Best Available Control Technology for construction equipment (CBACT). The plan shall specify use of diesel combustion emission control measures consistent with recommendations identified in the most-recent SLOAPCD CEQA Air Quality Handbook, such as, but not limited to idling limitations, diesel oxidation catalysts, catalyzed diesel particulate filters, or other District approved emission reduction retrofit devices. The plan and CBACT approach shall be developed in cooperation with SLOAPCD and CPUC staff before commencing transport or construction activities. The complete plan shall be submitted to the CPUC at least 60 days prior to transport or construction activities.

Mitigation A-1c: Offset tugboat NOx emissions with an offsite mitigation program. PG&E shall develop and implement or fund an offsite mitigation program that provides 1.544 tons of NOx reductions from existing sources in the Avila Beach and Port San Luis communities. PG&E shall initiate this program such that the emission reduction project(s) is in place prior to commencing the RSG transport activities. PG&E shall accomplish this either by developing and implementing a program of reductions (e.g., installing diesel engine or marine vessel emission control systems) or by providing mitigation funding and a

15 percent administration fee to the SLOAPCD for emission-reducing projects identified by the SLOAPCD (e.g., through the Carl Moyer Program). If PG&E elects to implement its own emission reductions, then the approach shall be developed in cooperation with SLOAPCD and CPUC staff.

Mitigation A-1d: Conduct an acute health hazard screening analysis for the toxic diesel component acrolein. At least 60 days prior to the start of transport activities, PG&E shall perform an acute health hazard screening analysis for acrolein emissions during offloading and transport activities at Port San Luis and submit the analysis to the SLOAPCD and CPUC. The health hazard index shall be identified for the point of maximum impact, and all locations with a health hazard index greater than 1.0 shall be identified. PG&E shall consult with SLOAPCD staff to determine the appropriate level of mitigation (e.g., by restricting access or changing the proposed sequence of activities to minimize emissions) if the screening analysis reveals a maximum health hazard index greater than 0.1. PG&E shall develop and implement a strategy approved by SLOAPCD for temporarily restricting public access from any location where the acute health hazard index would be greater than 1.0, if necessary, before commencing offloading or transport activities.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Transporters, tugboats, and other heavy-duty equipment such as cranes and lifts would be used for RSG offloading and transport to the temporary RSG storage facility. The duration of transport activity would be about two to four days for each of the two separate shipments. Along the route, the sources would travel on paved surfaces at very slow speeds. Combustion of fuels during transport of the RSGs would generate emissions (NOx, VOC, CO, SO2, and diesel-related particulate matter) that would affect local air quality for the brief duration of transport activities.

Daily emissions of NOx would be potentially significant, primarily as a result of tugboat operations associated with shipping the RSGs and stabilizing the barge.

By implementing mitigations for trip reduction, diesel emissions control, mitigation funding, and analysis of acute health risks, shown in Mitigation Measures A-1a, A-1b, A-1c, and A-1d, the potentially significant short-term impact of emissions from transport activities would be reduced to a less than significant level.

Impact A-2: Construction of the Original Steam Generator Storage Facility would cause emissions from portable concrete batch sources. Refer to the Final EIR page D.2-14.

Mitigation A-2a: Use registered portable equipment. PG&E or its contractor shall (1) use portable concrete batch sources that are registered in the Statewide Portable Equipment Registration Program or permitted by the SLOAPCD; and (2) maintain the portable equipment according to the specifications of the Program or SLOAPCD. PG&E shall provide evidence to CPUC indicating that appropriate registration or permits are in place.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: A temporary onsite concrete batch plant would supply the concrete for the OSG Storage Facility. Dry material handling and concrete mixing equipment would create emissions of dust and combustion contaminants. The portable concrete batch facility could require either a permit or registration with the SLOAPCD. As a portable equipment unit, the concrete batch facility may be registered with the Statewide Portable Equipment Registration Program (SLOAPCD Rule 220). The portable concrete batch sources could cause an adverse air quality impact if the Applicant does not comply with the requirements of the Portable Equipment Registration Program or obtain a permit to operate from the SLOAPCD. Registering or permitting the equipment would ensure that SLOAPCD-recommended pollution control devices are in place on the batch facility and that the anticipated emissions would be included in the inventory used for attainment planning. By implementing the following feasible recommendations (Mitigation Measure A-2a), the emissions would not be expected to impede attainment or maintenance of the ambient air quality standards, and this impact would be reduced to a less than significant level.

Biological Resources

Impact B-3: Vessel traffic would increase the likelihood of collisions with protected marine mammals. Refer to the Final EIR page D.3-31.

Mitigation B-3a: Marine Mammal Observer Training. Under the direction of PG&E, vessel operators shall be trained by a marine mammal expert, provided by PG&E, to recognize and avoid marine mammals. The operators shall be retrained annually. Retraining sessions shall focus on the identification of marine mammal species, the specific behavior of species common to the project area, and awareness of seasonal concentrations of marine mammals. In addition, PG&E

shall meet with the vessel operator prior to final transport to Port San Luis to convey all requirements regarding marine mammal safety measures. PG&E shall also provide a minimum of two marine mammal observers on all support vessels during the spring and fall gray whale migration periods and during periods/seasons having high concentrations of marine mammals in the project area. PG&E shall provide written documentation to CPUC verifying meetings with the vessel operators and identifying the marine mammal observers. Gray whales can be present from December to May, with the greatest numbers in January during the southward migration. A secondary peak occurs in March during the northward migration.

The observers shall have unobstructed views onboard each vessel and shall serve as lookouts so that collisions with marine mammals can be avoided. Additionally, PG&E shall provide to vessel operators and CPUC a contingency plan that focuses on avoidance procedures when marine mammals are encountered at sea. Minimum components of the plan shall include: 1) Vessel operators shall make every effort to maintain a distance of 1,000 feet from sighted whales and other threatened or endangered marine mammals or marine turtles; 2) Support vessels shall not cross directly in front of migrating whales or any other threatened or endangered marine mammals or marine turtles; 3) When paralleling whales, support vessels shall operate at a constant speed that is not faster than the whales; 4) Female whales shall not be separated from their calves; 5) Vessel operators shall not herd or drive whales; 6) If a whale engages in evasive or defensive action, support vessels shall drop back until the animal moves out of the area and 7) Any collisions with marine wildlife shall be reported promptly to Federal and State agencies including the National Marine Fisheries Service and the California Department of Fish and Game.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: The frequency and duration of offshore support vessels would increase substantially as a result of this project. Since collisions between vessels and gray whales, a federally protected marine mammal species, can result in severe injury or death, collisions are considered to be a potentially significant impact.

Marine mammals are present at both Port San Luis and the DCPP Intake Cove and are accustomed to vessel traffic and human activity. The area surrounding the mobile crane and Port Side Marine recreational boat launch is a hub of boating activity in Port San Luis and

results in a considerable volume of vessel traffic in the immediate vicinity of the RSG landing site. Vessel traffic is also common in the Intake Cove as a result of the operation of the DCPP dive boats and kelp harvester. Therefore, introducing a barge and tug boat into either area would not constitute a new impact to marine mammals.

There is a greater potential to encounter and disturb marine mammals at the Intake Cove landing site because of the usage of areas within the Cove as a year-round harbor seal haul out site and the persistent presence of sea otters rafting in the kelp beds inside of the breakwater. The presence of a barge and maneuvering vessels in the Intake Cove has the potential to result in a temporary displacement of otters from the Cove, however the displaced animals would more than likely move only a short distance to bull kelp located along the breakwater at the entrance of the Cove. The proposed marine mammal observer training and use of marine mammal observers (Mitigation Measure B-3a) are adequate measures to reduce the potential for impacts to marine mammals to less than significant levels.

Impact B-5: Vehicular travel into undisturbed areas could directly impact native vegetation. Refer to the Final EIR page D.3-34.

Mitigation B-5a: Delineation of Disturbance Limits. Limits of disturbance shall be clearly marked with construction fencing and approved by CPUC prior to project related activities at the site to ensure that there is no incursion of construction equipment or deposition of materials into habitats outside of the defined area. The construction fence shall remain in place for the duration of the active phase at the location.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Although unlikely, vehicular travel beyond the limits of undisturbed areas could result in the direct loss of vegetation and wildlife habitat. Depending on the area and level of impact, unintended disturbance to native communities and wildlife habitat could be significant. With the adoption of Mitigation Measure B-5a, the residual impacts would be less than significant.

Impact B-6: Deposition of excavated materials could result in indirect impacts to vegetation and wildlife habitat. Refer to the Final EIR page D.3-35.

Mitigation B-6a: Revegetation of Soil Disposal Areas. The applicant shall prepare and implement a revegetation plan to be approved by CPUC prior to approval of the project. The revegetation plan will provide for long-term stabilization and revegetation of the soil stockpile areas associated with the project. The plan shall provide for development

of long-term native plant cover compatible with surrounding areas of undisturbed native vegetation and wildlife habitat using local genetic sources of seed or cuttings for all native plant material. The plan shall include provisions for regular monitoring, maintenance including replacement of plants as needed, exotic species control, and performance assessment by a qualified independent third-party monitor. The revegetated areas shall achieve at least 75 percent of the native cover of appropriate reference sites in the general vicinity of the impact area as approved by CPUC. This performance standard shall be met within five years.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Deposition of excavated materials could cause indirect impacts to sensitive vegetation and wildlife habitat as a result of gullying caused by uncontrolled runoff; deposition of eroded materials into adjacent habitats downslope from the deposition site with consequent impacts on native vegetation and wildlife habitat and potential establishment of invasive exotic plant species on the disposal site and their spread into adjacent native habitats.

Mitigation measures for soil deposition impacts associated with the ISFSI project were identified in the Final EIR for the ISFSI project (SLO County, 2004). The addition of 2,300 cubic yards of fill placed in the ISFSI disposal sites would not likely appreciably affect the level of impact. With the adoption of Mitigation Measure B-6a, the residual impacts would be less than significant.

Cultural Resources

Impact C-1: Ground-disturbing activity may damage or destroy previously undetected cultural resources. Refer to the Final EIR page D.4-11.

Mitigation C-1a: Cultural Resources Treatment Plan (CRTP). PG&E shall develop a CRTP for potential cultural resources should construction of the TSAs require ground-disturbing activities, including procedures for protection and avoidance of Environmentally Sensitive Areas and Archaeological High-Probability Areas, and evaluation and treatment of the unexpected discovery of cultural resources including Native American burials; detailed reporting requirements by the Project archaeologist; curating any cultural materials collected during the Project; and requirements to specify that archaeologists and other discipline specialists meet the Professional Qualifications Standards mandated by the California OHP. Current

project design ensures that known and recorded cultural resources will be avoided during construction, and operation and maintenance. Specific protective measures shall be defined in the CRTP to reduce the potential adverse impacts on any currently undetected cultural resources to less than significant levels. The CRTP shall be submitted to the CPUC for review and approval at least 60 days before the start of construction.

Mitigation C-1b: Construction Monitoring. Archaeological monitoring shall be conducted by a qualified archaeologist familiar with the types of historic and prehistoric resources that could be encountered ground-disturbing construction. The qualifications of the principle archaeologist shall be approved by the CPUC.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Unknown and potentially significant cultural resources could exist below Parking Lot 1 as it is located on a coastal terrace overlooking the beach. Destruction of potentially significant cultural resources without mitigation would be a potentially significant impact. However, implementation of Mitigation Measures C-1a and C-1b would reduce impacts to less than significant levels.

Geology, Soils and Paleontology

Impact G-1: Extremely heavy loads could mobilize unstable ground along transport route. Refer to the Final EIR page D.5-14.

Mitigation G-1a: Prevent overloading of unstable ground along transport route. Existing geotechnical reports shall be reviewed by PG&E/CPUC not less than one year prior to the scheduled transport of the RSGs. PG&E/CPUC shall determine if the existing reports provide sufficient information to establish that the load-bearing capacity of soils and geologic features at the offloading area or along the transport route would support the loads, or if additional studies are necessary. If new studies are necessary, they shall be completed not less than ten months prior to commencement of the Proposed Project.

Either the existing geological reports or new studies shall meet the following performance criteria not less than six months before the scheduled start of transport activities: 1) Report clearly identifies any and all unstable portions of the transport route; 2) PG&E or its

consultant shall develop plans for any necessary road improvements, which shall be reviewed by the CPUC or its consultant to ensure that proposed improvements would both (1) ensure ground stability of all roads to be used during transport, and (2) remain within the footprint of the proposed route (as defined in the proposed project or the Replacement Steam Generator Offloading Alternative) so as to ensure that there would be no additional environmental impacts.

Any and all necessary road improvements shall be completed at least 60 days prior to the scheduled start of transport activities. The CPUC or its environmental monitor shall ensure construction activities remain within the defined road footprint. In addition, the CPUC or its consultant shall survey the transport route after the completion of construction but before the start of transport activities to ensure that all necessary improvements have been implemented on all roads to be used during transport.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: The extremely heavy transport loads and equipment would add an unusual load to the offloading area and the roads along the RSG transport route. PG&E has stated that the Access Road is currently in good condition and that it was designed and built to accommodate heavy loads. The condition of paved areas in the Port San Luis Harbor District is unknown. In certain places, it is possible that replacement steam generator transport could exceed the capacity of the road to support the vehicles. The locations most likely to be at risk are those areas that cross above landslides, such as Patton Cove, but with implementation of Mitigation Measure G-1a this impact would be less than significant.

Impact G-2: Temporary effects of earthquake shaking could endanger worker safety. Refer to the Final EIR page D.5-15.

Mitigation G-2a: Protect workers from temporary effects of earthquake shaking. The Applicant shall produce a safety plan that specifically includes measures that will be taken to ensure worker safety during earthquake-caused ground shaking. Elements of the plan should include, but not be limited to the following: (a) a protocol for workers to follow in the event an earthquake occurs; (b) protocols for set-up and management of equipment during the loading, transport, offloading, staging, and installation phases of the project that address the potential effects of ground shaking; (c) training for workers so they will know what to do in the event of an earthquake. CPUC shall review the safety plan for consistency with California

Occupational Safety and Health Standards and approve the safety plan prior to commencement of any proposed project activities.

Mitigation G-2b: Prevent casualties caused by falling rocks. Rocks and boulders that are precariously situated above portions of the transport route shall be identified and evaluated to determine if they should be removed or stabilized prior to project commencement.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: In the unlikely, but not impossible, event that a major earthquake occurs in the region during the Proposed Project, the effects of ground shaking could endanger workers. This is especially a concern during offloading and transport activities, when large loads would be lifted and handled by cranes and transporters/movers. Seismic ground shaking could create sudden breaks in road surfaces, loosen rocks and boulders from road cuts and slopes, trigger landslides, cause equipment in the offloading areas to topple, and possibly destabilize the transport tractors or the load. Workers could be injured or killed if they are in the path of falling rocks or toppling equipment. With the implementation of Mitigation Measures G-1a, G-2a, and G-2b, the impact would be less than significant.

Impact G-3: Ground shaking could compromise integrity of the OSG Storage Facility. Refer to the Final EIR page D.5-17.

Mitigation G-3a: Long Term Seismic Program Update. The analyses completed for the Long Term Seismic Program shall be refined to incorporate new earthquake data that have been derived since publication of the LTSP. This update should be reviewed by the Diablo Canyon Independent Safety Committee, the NRC, and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design. Based on the updated information, a new Design Earthquake (the seismicity characteristics that structure is designed to withstand) shall be developed for the proposed OSG Storage Facility by PG&E. PG&E shall also confirm that the updated information has been submitted to the NRC for consideration in the OSG Storage Facility design plan.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: The anticipated ground motions at the DCPP site as determined in the 1988 LTSP form the present design basis for the proposed OSG Storage Facility. Severe

ground shaking could compromise the integrity of the OSG Storage Facility if the materials and design of the structure are not based on all relevant earthquake data, including recent data on earthquake activity near the DCPP site. Ground shaking could cause damage to the OSG Storage Facility if the facility is not designed according to relevant recent earthquake data. Implementing Mitigation Measure G-3a would ensure the 1988 LTSP is updated and that this impact is reduced to less than significant levels.

Impact G-4: Slope instability could affect design, construction, and functioning of the OSG Storage Facility. Refer to the Final EIR page D.5-17.

Mitigation G-4a: Evaluate slope stability in the vicinity of the OSG Storage Facility site. A geotechnical evaluation shall be undertaken by PG&E and/or the construction contractor to assess the stability of the north-facing slopes in the area of the proposed OSG Storage Facility, both above and below the level of the current "man camp." This report should be reviewed and approved by PG&E and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design. Such an evaluation shall include exploratory borings and surface mapping of the north-facing slope. Slope stability evaluation shall include analysis of the dip of layered rock, identification of clay beds, and presence and orientation of small faults and fractures with orientations parallel or subparallel to the slope. Static and dynamic stability analysis shall be performed in accordance with all applicable building codes, considering the information developed under Mitigation Measure G-3.

If the report indicates either the upper or lower portion of the slope could become unstable, remedial measures (e.g., construction of engineered retaining wall; improved slope drainage; remove excess colluvium; engineering design of the structure to withstand postulated landslide loads) shall be developed or a different location for the OSG Storage Facility shall be selected.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: The proposed OSG Storage Facility would be located at the base of a steep slope comprised of Obispo Volcanics. A large, old landslide is mapped on this slope and in the "man camp" area. Maps provided by PG&E did not indicate the amount of cut and fill modifications to the old landslide in the "man camp" area, so it is not possible to completely assess the suitability of this site for a long-term storage facility for radioactive material, albeit low-level waste. The proposed OSG Storage Facility would be on a modified landslide area above Diablo Creek. Settling, shifting, or sliding in this area could eventually

compromise the OSG Storage Facility. A detailed geotechnical evaluation to identify any necessary methods to stabilize slopes in the vicinity of the proposed OSG Storage Facility, or specification of a bunker-type construction style including solid, reinforced cement walls that are bound together for the storage facility would minimize the impact of this geologic hazard to less than significant levels.

Hazards and Hazardous Materials

Impact H-1: Heavy equipment fuel, oil, or hydraulic line leak or rupture could cause hazardous materials release. Refer to the Final EIR page D.6-15.

Mitigation H-1a: Implement DCPP Spill Response Procedures. In the event of a fuel, oil, or hydraulic line leak or rupture, collect spilled fluid with absorbent materials. Prevent or stop spill from spreading to the environment. In the event that a spill reaches bare soil, excavate impacted soil and dispose of with absorbent materials. In the event that a spill occurs on Port San Luis Harbor District property or in ocean water, Central Coast RWQCB and Harbor District personnel shall be immediately notified and corrective measures, such as containment, shall be taken immediately. A copy of the DCPP Spill Prevention Control and Countermeasure Plan shall remain with the contractor at all times.

In addition, PG&E shall develop and implement a worker environmental training program that communicates to all appropriate personnel location-specific environmental concerns and appropriate work practices, including spill prevention and response measures, as well as site-specific physical conditions to lessen the impact of potential spills (i.e., identification of flow paths to sensitive resources). A copy of this plan shall be submitted for CPUC approval prior to commencement of RSG transport activities.

Mitigation H-1b: Conduct Routine Inspections and Maintenance of Transporter. All transporter vehicles shall be inspected at the beginning of each work day and at the end of each work shift. While in transport, continual visual inspections shall be conducted by the crew. If any leaks are observed during transport, appropriate action shall be taken to stop the leak prior to the continuance of transport. Any necessary spill response shall be conducted according to Mitigation Measure H-1a.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: During transport of the RSGs, hazardous materials such as vehicle fuels, oils, and other vehicle maintenance fluids would be used and stored onsite. Spills of hazardous materials during transport activities could potentially cause soil, surface water, or groundwater contamination. This potentially significant impact would be reduced to a less than significant level through the implementation of Mitigation Measures H-1a and H-1b.

Impact H-2: Heavy equipment maintenance could cause hazardous materials release. Refer to the Final EIR page D.6-17.

Mitigation H-2a: Properly Handle Maintenance Waste. Routine maintenance or unscheduled repairs shall be conducted on appropriate containment systems, and all fluids removed from vehicles or used for cleaning shall be properly contained, labeled, and manifested, according to the procedures of the DCPP Spill Prevention Control and Countermeasure Plan. All hazardous waste shall be properly disposed of in accordance with federal and state regulations, and local ordinances. Storage of hazardous material on property outside of DCPP (e.g., Port San Luis Harbor District) shall be prohibited unless a license (or agreement) from the property owner and an insurance policy or bond for clean-up are obtained. In addition, the worker environmental training program discussed in Mitigation Measure H-1a shall include discussion of material handling, storage, and disposal procedures per applicable regulations and designed to ensure hazardous materials are handled and contained safely.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Use of solvents and cleaners, or replacement of used waste oils and lubricants during routine maintenance or unscheduled repairs may impair the environment or adversely affect human health and safety if proper use and disposal procedures are not followed. An unauthorized release of a significant quantity of hazardous materials or waste may adversely impact the environment over time. This potentially significant impact would be reduced to a less than significant level through the implementation of Mitigation Measure H-2a.

Impact H-3: Previously unknown contaminated soil/groundwater could be encountered during construction. Refer to the Final EIR page D.6-18.

Mitigation H-3a: Stop Work and Notify Appropriate Project Personnel and Regulators. If impacted soil and/or groundwater is encountered

during excavation and/or groundwater dewatering, work shall stop immediately. Impacted soil shall be placed on 20-mil HDPE and covered. The construction superintendent, designated PG&E and CPUC personnel, and applicable regulatory agencies shall be notified immediately. Contingency planning for such an event shall be conducted prior to start of work. The nature and extent of contamination shall be identified through soil and/or water testing, and appropriate remedial action proposed and approved by the CPUC prior to disturbing additional material.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Excavation and/or construction dewatering activities during staging and preparation may encounter previously unknown hazardous materials contamination of soil or groundwater. Contamination may be inadvertently released to un-impacted areas and/or create a health risk for construction workers. This potentially significant impact would be reduced to a less than significant level through the implementation of Mitigation Measure H-3a.

Hydrology and Water Quality

Impact W-1: Offloading the generators at Port San Luis could disturb marine sediments or accidentally introduce contaminants to the ocean water. Refer to the Final EIR page D.7-6.

Mitigation: See Mitigation Measures H-1a, H-1b and H-2a above.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: A transport barge would be brought to and secured at the water's edge at Port San Luis. There will be little or no clearance between the barge and the ocean bottom. The proximity of the barge to the bottom, with propeller wash from the tug boats, could disturb underwater sediments and locally reduce water quality. Materials used by vehicles in the offloading process (such as fuel and oil) could accidentally spill and enter ocean water.

According to preliminary surveys conducted by the applicant, the ocean bottom at the point of offload is sandy. The area would be surveyed in more detail by a diver for sensitive marine life before the barge is positioned for offloading, and mats could be used to minimize disturbance to the sea floor.

Disturbance of marine sediments is not considered a significant water quality impact because the bed is sandy, offloading would be done at high tide, and no dredging would be required. All marine sediment disturbance would be short-term from offloading activities and would not be likely to substantially degrade water quality.

Spills of materials used by offloading and transport equipment or vehicles could substantially degrade surface water quality, as described under Impacts H-1 (Heavy equipment fuel, oil, or hydraulic line leak or rupture could cause hazardous materials release) and H-2 (Heavy equipment maintenance could cause hazardous materials release) in Section D.6. Although this would be an unlikely occurrence and spills would likely be of small quantities, Mitigation Measures H-1a, H-1b, and H-2a would insure that this impact remains less than significant.

Impact W-2: Construction and use of staging and preparation areas could result in disturbance of sediments or spill of materials that would contaminate stormwater. Refer to the Final EIR page D.7-7.

Mitigation W-2a: A SWPPP shall be prepared for construction activities. PG&E shall prepare a SWPPP, and it shall be submitted to the CPUC and the County of San Luis Obispo for review and approval prior to construction activities regardless of disturbance area size. The SWPPP shall contain a site map which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP shall list Best Management Practices (BMPs) the discharger will use to protect against polluted storm water runoff. PG&E shall adhere to the SWPPP for all project-related construction activities. Should the total construction area exceed one acre in size, a Notice of Intent and the SWPPP shall be submitted to the RWQCB.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Approximately 40,000 to 50,000 square feet (0.9 to 1.1 acres) of space would be required for the RSG storage facility, temporary warehouse space and the laydown area. These areas drain into the existing stormwater drainage system at the site. PG&E has a substantial stormwater drainage system that will accommodate any runoff associated with the project. Stormwater draining to the Pacific Ocean could be contaminated by spilled materials during construction and use of these facilities. Should the total area exceed one acre, a Notice of Intent and SWPPP would be required by the RWQCB, which would ensure that soil and sediment disturbance is kept to a minimum and contained to the

maximum extent possible. Although the RWQCB would not require a SWPPP for construction less than one acre, the County of San Luis Obispo routinely requires a SWPPP as part of its land use permitting process. A SWPPP is recommended for this project to ensure minimal stormwater pollution impact.

Similar to Impacts H-1 (Heavy equipment fuel, oil, or hydraulic line leak or rupture could cause hazardous materials release) and H-2 (Heavy equipment maintenance could cause hazardous materials release), mitigation would be necessary to insure that spills are kept to a minimum and cleaned up in a timely manner should they occur. Mitigation Measure W-2a in combination with Mitigation Measures H-1a and H-2a would insure that Impact W-2 would be less than significant.

Impact W-3: Fuel or other contaminants associated with heavy equipment used during OSG removal, transport, and storage could spill and contaminate surface waters. Refer to the Final EIR page D.7-8.

Mitigation: See Mitigation Measures H-1a and H-2a above.

Findings: The aforementioned mitigation measures, along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Heavy equipment would be used in the removal and transportation of the original steam generators as well as during construction of the OSG Storage Facility. For Impacts H-1 (Heavy equipment fuel, oil, or hydraulic line leak or rupture could cause hazardous materials release) and H-2 (Heavy equipment maintenance could cause hazardous materials release), fuel or other contaminants associated with heavy equipment used in this operation could spill and contaminate surface waters. Mitigation Measures H-1a and H-2a would reduce this impact to a less than significant level.

Impact W-4: Fuel or other contaminants associated with heavy equipment used during RSG installation could spill and contaminate surface waters. Refer to the Final EIR page D.7-9.

Mitigation: See Mitigation Measures H-1a and H-2a above.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Heavy equipment would be used in the installation and return to service of the RSGs. For Impacts H-1 (Heavy equipment fuel, oil, or hydraulic line leak or rupture could cause hazardous materials release) and H-2 (Heavy equipment maintenance could cause hazardous materials release), fuel or other contaminants associated with heavy

equipment used in this operation could spill and contaminate surface waters. Mitigation Measures H-1a and H-2a would ensure that this impact is reduced to a less than significant level.

Land Use, Recreation and Agriculture

Impact L-2: Transport would disrupt recreational activities. Refer to the Final EIR page D.8-26.

Mitigation L-2a: Avoid peak recreational usage. PG&E shall not schedule offloading during times of peak recreational usage of Port San Luis (as defined by and coordinated with the Port San Luis Harbor District).

Mitigation L-2b: Schedule Pecho Coast Trail hikes around RSG transport. PG&E shall schedule the twice-weekly Pecho Coast Trail hikes such that they do not occur during transport activities. PG&E shall also ensure that the number of hiking opportunities does not diminish as a result of the proposed project. The number of hiking opportunities available shall meet or exceed the current level of twice-weekly hikes of up to 15 people per hike, as discussed above.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: RSG transport would pass through recreational facilities at Port San Luis and at the Pecho Coast Trail. During offloading and potential storage, some recreational activities at Port San Luis such as boating, fishing, or recreational vehicle use could be temporarily precluded. Offloading of the RSGs would also have the potential to affect the recreational vehicle campsites at Port San Luis. Impacts on recreational users would be considered potentially significant, but would be reduced to less than significant levels with implementation of Mitigation Measures N-1a and L-2a.

Offloading and initial transport activities would occur at the northeastern (Port San Luis) trailhead of the Pecho Coast Trail. Given the high recreational value and limited access to this resource, any disruption or preclusion of the use would represent a potentially significant impact. However, this impact would be reduced to a less than significant level with implementation of Mitigation Measures N-1a, L-2a and L-2b.

Noise and Vibration

Impact N-1: Offloading would temporarily increase local noise levels near sensitive receptors. Refer to the Final EIR page D.9-6.

Mitigation N-1a: Provide advance notice of offloading and transport. PG&E shall provide advance notice of each phase of RSG delivery, between two and four weeks prior to offloading, of planned offloading and transport activities and timing to the CPUC, the Port San Luis Harbor District, Harbor District tenants, and nearby residents within the Port San Luis Trailer Park and the Harbor Terrace area of Port San Luis. The advance notice shall describe the potential noise disruption and the steps PG&E plans to take to minimize the noise (e.g., by enclosing and muffling equipment, eliminating backup signals or by limiting idling) and it shall provide a page in a format suitable for reproduction and posting by the Harbor District. PG&E shall also hold a meeting for Harbor District tenants between two and four weeks prior to offloading. If project delays of more than two weeks occur, an additional notice shall be made.

Mitigation N-1b: Provide liaison for nuisance complaints. PG&E shall identify and provide a liaison person to respond to concerns of noise from offloading activities. Procedures for reaching the liaison via telephone or in person shall be included in notices distributed and posted in accordance with Mitigation Measure N-1a. Nuisance complaints filed with the liaison and the approach used by PG&E to resolve the complaint shall be reported to the CPUC and the Port San Luis Harbor District. Procedures for responding to callers shall be submitted to the CPUC for review and approval prior to offloading.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Offloading and transport-related activities would increase noise levels temporarily for receptors near Port San Luis and the DCPP Access Gate. Relatively steady operation of the tugboats and lifting equipment would need to occur while the barge and push boats are landed at the shore. Along the transport route, no single location would be exposed to transporter noise for more than about an hour during each of the sixteen one-way trips. However the transport activity could occur at night, when receptors are more sensitive to noise. Residents of the Port San Luis Trailer Park on Avila Beach Drive and the Harbor Terrace area of Port San Luis, about 1,200 feet from the offloading, would experience the greatest potential noise impacts. Noise levels for users of Port San Luis could temporarily exceed 90 dBA for each trip (for locations within 25 feet of the transporter), and they could be over 73 dBA for locations within 200 feet.

According to the San Luis Obispo County Noise Element, ambient noise levels in the Proposed Project area are currently less than 60 Ldn for locations more than 300 feet from

Avila Beach Drive in the vicinity of the offloading activities, and any area that is located away from the natural noise generated from wave action along the coast. The temporary passing of transporters and work crews during each steam generator transport trip would temporarily increase the noise levels along Avila Beach Drive by about 7 to 10 dBA. This could create a short-term nuisance for residents of the Port San Luis Trailer Park and Harbor Terrace area. The relatively steady operation of tugboats and other offloading equipment at Port San Luis could also create a short-term nuisance for residences and recreational users of Port San Luis. This nuisance would be exacerbated by pure tones, such as backup signals, which can be audible over other background noise, especially at night. The noticeable noise increase above ambient levels would be a potentially significant short-term impact because of the likelihood of disrupting noise sensitive uses. However, because the local Noise Element and Noise Ordinance do not address short-term nuisances and exempt noise from utility work, these noise levels would not exceed any established standards. Coordinating with the noise sensitive land uses would reduce the impact to a less than significant level by providing adequate advance notice of the transport schedule and making a public liaison available to the affected persons in the area.

Public Services and Utilities

Impact U-1: Project would disrupt utility systems. Refer to the Final EIR page D.10-5.

Mitigation: See Mitigation Measure G-1a above.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: The size and weight of the combined RSGs and transporter being offloaded at Port San Luis and moving along Avila Beach Drive and the DCPP Access Road could potentially result in disruptions to utility systems (e.g., domestic water or natural gas pipelines, telecommunications lines, etc.). The total weight of the RSGs and transporter is expected to be approximately 500 tons. The width of the transporter is expected to be approximately 11 to 16 feet, and the total length would be approximately 68 feet, although dimensions of the transporter would not be known until after a final transport vendor is selected.

The DCPP Access Road and the paved roads at the facility were all designed during original construction to support heavy equipment and loads, such as the OSGs and other equipment used at the power plant. According to the Applicant, the transport contractor likely would perform a complete load path analysis prior to movement of the RSGs in Port San Luis parking lot and the section of Avila Beach Drive between the Port and DCPP Access Road. With this analysis, the transportation equipment provided by the contractor should be capable of spreading the load over a larger area, thereby decreasing the axle loads to prevent

damage to subsurface structures. The transportation route would not be blocked or obstructed by any overhead lines or aboveground utilities.

In addition, extremely heavy loads could mobilize unstable ground along the RSG transport route. Mitigation Measure G-1a (Prevent overload of unstable ground along the transport route) would require review and/or commissioning of studies to establish that the load-bearing capacity of soils and geologic features along the transport route would support the loads. Implementation of this mitigation measure would reduce the potential for impacts to buried utilities to a less than significant level.

Impact U-2: Project would impede emergency access. Refer to the Final EIR page D.10-6.

Mitigation U-2a: Pre-position emergency responders during road blockages. The access plan submitted to PG&E by the transportation contractor shall include provisions for the pre-positioning of emergency vehicles and personnel prepared to respond to an emergency if access cannot be maintained along the transportation route for the RSGs. The Applicant shall coordinate with County emergency service providers and the Port San Luis Harbor District to determine the appropriate resources to be pre-positioned in case of an emergency. A copy of the access plan shall be provided to the CPUC for review and approval prior to any transport activities.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Fire protection or other emergency service providers could be required at a site along the transportation route in the event of an accident or emergency, or could require access to the DCPP facility along the DCPP Access Road, or access to Port San Luis Harbor along Avila Beach Drive. Although the potential for this occurrence during transport activities is low, portions of the DCPP Access Road could become temporarily blocked by the transporter, and the transporter could inhibit access to DCPP or portions of the DCPP Access Road. The route planned for the transporter complies with the 2004 CDF/San Luis Obispo County Fire Department Road Standards. Roads need to be greater than 20 feet wide to accommodate CDF/San Luis Obispo County Fire Department equipment transportation. The transporter moving down Avila Beach Drive between DCPP Access Road and Port San Luis would take up more than a full lane of traffic, which could restrict through-access, but the road and shoulder are currently wide enough to allow access of emergency vehicles even with the transporter on the road. The DCPP Access Road is approximately 25 feet wide with no shoulder, and the transporter used to carry the RSGs would be between 11 and 16 feet wide. Although most portions of the DCPP Access Road would be wide enough to allow emergency access, at two locations along Diablo Canyon

Road the transporter would potentially entirely block the road as it maneuvers around the sharp bends.

As part of the Proposed Project, the Applicant would modify its existing Stranded Plant Plan, which is part of the existing DCPP Emergency Response Plan, to ensure that any situations that might occur during a lapse in emergency access to the plant could be managed by onsite resources. Additionally, the transport contractor would be required to submit an access plan prior to the initiation of any transportation activities in order to maintain emergency access to the greatest extent feasible and have emergency contingencies prepared in case access cannot be maintained. If access cannot be maintained, however, the access restriction could result in disruption of emergency services, which would be a potentially significant impact. Although potentially significant, this impact could be reduced to a less than significant level with the implementation of Mitigation Measure U-2a.

System and Transportation Safety

Impact S-1: RSG barges would create a navigational hazard in Port San Luis. Refer to the Final EIR page D.12-19.

Mitigation S-1a: Barge Navigational Safety Plan. The Applicant shall develop a barge navigational safety plan to minimize the impact on existing Port operations. The plan shall be submitted to, and approved by the Port San Luis Harbor District. At a minimum the plan shall include the following elements: 1) Identify moored vessels that will need to be temporarily relocated, and provide necessary temporary mooring facilities or funding for the Port District to accommodate the temporary relocation of moored vessels; 2) Identify activities such as home fleet and dry dock operations in the Port that may conflict with barge transport and/or offloading. Working with the Harbor District, identify procedures that will minimize conflicts with existing operations and safety hazards to the public and project personnel; 3) Identify hazardous wind and swell conditions that would create safety hazards during barge transport within Port San Luis and during barge unloading. Develop written procedures to avoid barge transport and unloading during conditions that would increase the risk of barge collision or capsizing, and conditions that could contribute to an accident during barge unloading and 4) Working with the Harbor District, identify additional navigational aids and security that will be necessary to safely move the barges through the Port. The applicant can provide the additional navigational aids and/or security, or contract with the Harbor District to provide the necessary services.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Barges would deliver the RSGs through Port San Luis following the fairway markers to Harford Pier and a location on the west side of San Luis Obispo Bay between the mobile boat hoist pier and Harford Pier. Delivery would likely occur during high tide, and offloading would occur to a parking lot approximately 1,000 feet from the DCPP Access Gate. The size of the barges would require the temporary relocation of some moored vessels to safely accommodate the barge. It is also likely that measures taken to assure the safe transport and offloading of the RSGs would disrupt port operations. However, with implementation of Mitigation Measure S-1a, potential impacts can be mitigated to a level that is considered less than significant.

Impact S-2: RSG transport between Port San Luis and the DCPP could impede emergency response vehicles. Refer to the Final EIR page D.12-22.

Mitigation: See Mitigation Measure U-2a above.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: During RSG delivery, the road between Avila Beach Drive and the DCPP site would be temporarily blocked. This would limit the ability of emergency service personnel to respond to incidents at DCPP. The possible disruption of fire protection or other emergency services could lead to adverse public safety impacts. However, potential impacts can be mitigated to a level that is considered less than significant with Mitigation Measure U-2a.

Impact S-5: Seismic activity could compromise the integrity of the OSG Storage Facility. Refer to the Final EIR page D.12-25.

Mitigation: See Mitigation Measure G-3a above.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: The ISFSI SAR and a 1988 Long Term Seismic Program (LTSP) report completed by PG&E addressed potential ground shaking, fault rupture, and seismicity at the DCPP site. Numerous additional published documents, and data on earthquake activity in the area over the past 20 years, are available to supplement and compare the information provided in the PG&E reports. The anticipated ground motions at the DCPP site as

determined in the LTSP form the present design basis for the proposed OSG Storage Facility. Severe ground shaking could compromise the integrity of the OSG Storage Facility, if the facility design does not incorporate recent earthquake data. Seismic activity would result in a less than significant impact with implementation of the 1988 LTSP update as recommended by Mitigation Measure G-3a.

Impact S-7: Residual contamination would be present on the OSGs with the potential for radiation exposure during offsite transport. Refer to the Final EIR page D.12-27.

Mitigation S-7a: Alternate OSG Barge Loading Site. In order to avoid exposing the public to residual OSG contamination, the Applicant shall utilize the DCPP Intake Cove for OSG barge loading should offsite transport and storage be required.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Exposure to individuals in the area during OSG barge loading would likely be far below applicable regulatory levels (e.g., 10 mrem/year). Modeling results indicate that the unmitigated exposure rate would be approximately 0.1 mrem/hour at a distance of 50 meters. This would provide for a total loading time of 100 hours before the acceptable public exposure limit of 10 mrem/year is reached. Radiological monitoring would be required by NRC to protect worker and public health, thus it is unlikely that public exposure would exceed 10 mrem/year. Therefore, potential impacts associated with OSG transport offsite would be considered less than significant.

Traffic and Circulation

Impact T-1: RSG transport may damage roadway/parking infrastructure and would temporarily increase local traffic. Refer to the Final EIR page D.13-12.

Mitigation T-1a: Repair any damage to pavement from the transporter. The Applicant shall repair and bear any costs of repair of any significant damage to pavement (e.g., road or parking lots) that results from the transportation of the RSGs. The repairs shall bring the pavement to the pre-project or better condition.

Findings: The aforementioned mitigation measure along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

I-95

Supportive Evidence: Transport of the RSGs from Port San Luis to the DCPP would use approximately 1,500 feet of Avila Beach Drive and approximately 200 feet of Diablo Canyon Road (DCPP Access Road) to the DCPP Access Gate. From the Access Gate the transport route would be located within the boundaries of the DCPP property, off-limits to the general public. Four round trips would be required to transport RSGs for Unit 2 in 2007, with four additional round trips to transport the RSGs for Unit 1 in 2008. The transporter trips and additional project support trips along a 1,500-foot portion of Avila Beach Drive, at night if necessary (as per the Applicant), are not expected to cause significant impacts because the 1,500-foot section of Avila Beach Drive experiences low traffic volumes even during peak summer periods.

The number of additional personnel that would be required during RSG offloading at the Port San Luis and transport was estimated at 30 workers, which would be in addition to the 1,400 DCPP personnel working at DCPP during non-outage periods. It is assumed that during the RSG offloading at Port San Luis, these transport workers would make two-round-trips per day to Port San Luis (60 daily one-way trips) or to DCPP. The peak day scenario on Avila Beach Drive west of Diablo Canyon Road would occur when all 30 workers travel to Port San Luis in addition to the RSG transporter trips, for a total of 76 one-way trips. It is assumed that any support equipment to handle the RSGs at Port San Luis would be delivered to Port San Luis before the RSGs arrive and would not contribute to the peak traffic.

Transport would occur during non-outage periods and during at the end of the non-peak tourist season, September through November (see Project Description), when the local roads are at LOS A and are anticipated to remain at this LOS in the future.

The ground transporters used to move the RSGs from Port San Luis to the RSG storage facility would be platform trailers specifically designed to move heavy loads. These trailers have multiple wheels to allow the weight of the load to be spread out over a large area thereby decreasing the impact to the road and underlying utilities. Additionally, the weight of the RSG would be controlled through hydraulic distribution and leveling equipment on the trailer. Thus, no road damage is anticipated.

The Port San Luis parking lot would be used by the transporter to access Avila Beach Drive. Because parking lot pavement often is not designed to the same standards as roadway pavement, damage to the Port San Luis parking lot pavement is possible, but unlikely to occur. In order to address this potential impact PG&E proposes to use mats and other ground reinforcing methods to distribute weight, and steel plates may be used under the barge ramps to protect the underlying asphalt. The impact is expected to be less than significant due to PG&E's efforts to protect the parking lot surface and because of the limited activities (eight transporter round-trips at maximum) and the transporter design that distributes the weight of the steam generators. However, a mitigation measure is suggested below in order to ensure that any unforeseen damage to pavement is repaired.

Since road damage from transport is not anticipated, and the addition of 30–34 round-trips (60–68 oneway trips) to local roads during a non-peak season, and during a non-outage period is well below normal outage period traffic, this impact would be considered adverse but less than significant.

Impact T-2: Staging and preparation would temporarily increase local traffic. Refer to the Final EIR page D.13-13.

MitigationT-2a: Avoid travel during peak season on Avila Beach Drive and other local surface roads. The applicant shall develop an alternative project schedule that would restrict the project-related personnel from travel on Avila Beach Drive during peak season (e.g., May to October), evening peak hours of between 4:00 p.m. and 7:00 p.m. In addition, all project-related traffic shall be restricted from travel on Avila Beach Drive during peak season (e.g., May to October) weekends between the hours of 10:00 a.m. and 5:00 p.m. To achieve this, the applicant shall not schedule project employee shift changes between 4:00 p.m. and 7:00 p.m. during May to October period, during weekdays. The applicant shall not schedule project-related or outage-related employee shift changes between the hours of 10:00 a.m. and 5:00 p.m. during May to October period during weekends.

Mitigation T-2b: Avoid travel during peak time on Highway 101. The Applicant shall develop an alternative project schedule that would restrict the project-related personnel from travel on Highway 101 during peak hours of operation. Typically, morning peak hours are between 6:00 a.m. and 8:00 a.m. and evening peak hours are between 4:00 p.m. and 5:30 p.m.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Approximately 100 to 700 workers would be needed during the RSG staging and preparation periods that occur prior to the actual outage. In addition to the project-related personnel accessing the DCPP, there would be additional trucks delivering materials to construct necessary temporary staging facilities. The Applicant did not provide information on the number of trucks needed to deliver materials. It was estimated that 10 trucks per day (for a total of 20 daily one-way trips) would be needed to deliver the materials. Therefore, additional worst case traffic is estimated to be 710 round trips per day (1,420 one-way daily trips or 142 peak hour trips typically estimated as 10 percent of the average daily traffic). Staging and preparation is expected to occur before the outage period, therefore there would be no outage-related traffic during this phase. Although the highest numbers of project-related workers are not currently anticipated to be needed during peak

tourism season, the possibility of unanticipated changes in the project schedule is considered here.

The addition of 142 trips to the peak hour traffic on Avila Beach Drive would add over 15 trips to this roadway. Under the anticipated future conditions, Avila Beach Drive west of San Luis Bay Drive is expected to perform at LOS C during the peak hour. The addition of 142 peak hour trips to this roadway would worsen from LOS C to LOS D. The addition of more than 15 trips to a roadway that would perform at LOS D with the project would be considered potentially significant. This impact occurs because Avila Beach Drive and San Luis Bay Drive provide the only local access to Highway 101.

Several Highway 101 segments operate at below LOS D. Caltrans strives to operate its highway facilities between LOS C and D. Because the project could potentially contribute over 100 peak hour trips to Highway 101, this impact would be considered significant. Scheduling project worker trips to avoid peak times, as in Mitigation Measures T-2a and T-2b, would reduce this impact less than significant levels.

Impact T-3: Steam generator replacement activities would temporarily increase local traffic. Refer to the Final EIR page D.13-16.

Mitigation T-3a: Develop a trip reduction program. The Applicant shall develop a trip reduction program for the Proposed Project. The goal of this program shall be to achieve a 50 percent reduction of project-related vehicle trips during all steam generator replacement activities that overlap with outage periods or normal operation. With such 50 percent reduction, not more than 3,160 vehicles would enter the plant during a 24-hour day. This limit represents vehicles from a normal workforce of 1,400 plus 1,285 outage workers with 475 project-related vehicles representing a two-person average vehicle occupancy for the 950 project-related workers. PG&E shall develop and maintain a daily count of vehicles entering the plant for verifying the success of this program. The program shall include but not be limited to the following activities: 1) Provide appropriate offsite parking for the project-related employees and provide a shuttle service between the offsite parking and DCPP. Any parking arrangements shall be approved by the County of San Luis Obispo (and the landowner of the space(s) proposed to be used for parking if not owned by the County) prior to the project commencement. Any parking fees shall be borne by the applicant; 2) Provide a shuttle that would be available to all personnel that would enter DCPP during the project, and institute a set of incentive-based measures that would encourage use of the shuttle by all personnel (i.e., regular employees, outage personnel and project-related workers); 3) Develop a work schedule that would prevent employees traveling on

Avila Beach Drive and other local roadways during peak hours as specified in Mitigation Measure T-2a; 4) Institute administrative measures, potentially through the use of contract terms, to prohibit the project personnel from parking in the local communities such as Avila Beach or Port of San Luis; 5) Develop a construction materials and machinery delivery and waste removal program that would avoid project-related and other DCPP service truck traffic on Avila Beach Drive and other local roadways during peak hours as specified in Mitigation Measure T-2a and 6) Develop a public notification program that allows the public to be informed about the traffic reduction program, project schedule and potential traffic congestion.

The trip reduction program shall be coordinated with and approved by the County of San Luis Obispo and the Port San Luis Harbor District.

See also Mitigation Measures T-2a and T-2b above.

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: The worst case circulation scenario would occur if the original steam generator removal, transport and storage phase would occur during the peak tourist season, which occurs during the period from May through October. During this phase, the Proposed Project circulation impacts would be from commuter vehicles of the personnel assisting in the removal and transport of the OSGs to the proposed onsite storage facility (900 to 950 workers), in addition to the outage personnel (1,285 workers) and the permanent DCPP personnel (1,400 workers), for a total of 3,635 workers or 2,235 additional workers over non-outage conditions.

Within the peak tourist season, the peak traffic occurs during the summer months. Historically, the planned refueling outages did not occur during the summer (the only one outage that occurred during the summer period was in August 1986; no scheduled outages have occurred during the summer period since then). Also, the project-related outage is longer than the normal planned outage (75-80 days vs. 30-40 days). Therefore, the typical summer time traffic in the Avila Beach area does not include the planned outage-related traffic.

The applicant plans to conduct this phase of the proposed project outside of the peak tourist season. However, it is reasonable to assume that the proposed project schedule could change and the project-related outage could occur during the summer.

Offsite transport of the OSGs would not occur under the proposed project. Worst case traffic would occur during the 75- to 80-day outage period when project-related personnel would travel to DCPP in addition to the outage personnel, and if this project phase would overlap with the peak tourist season, a significant impact is expected.

The applicant has stated that it would incorporate alternate work hours for the workers during the outage period to accommodate the short-term increase in worker traffic, but did not provide details on scheduling.

The addition of 95 round trips to the peak hour traffic on Avila Beach Drive would increase the V/C ratio on this roadway by more than 0.1 and would be considered significant. Avoiding project-related travel during peak tourist season and peak hours would be required under Mitigation Measure T-2a. This measure and implementation of trip reduction measures identified below would avoid the potentially significant impact to Avila Beach Drive and other local roads and reduce the impact to local roads to a less than significant level.

Visual Resources

Impact V-1: Short-term visibility of RSGs and transporters to viewers at Harford Pier and San Luis Obispo Bay Viewpoints. Refer to the Final EIR page D.14-22.

Mitigation V-1a: Offloading and transport activities during off-season time periods. RSG offloading and transport shall occur from November through April. If transport during peak recreational season (May through October) is unavoidable, RSG offloading and transport to the DCPP Access Gate shall be timed to take place during weekdays, and should be limited to the shortest feasible period of time.

Mitigation V-1b: Minimize disruptive night lighting in the vicinity of Harford Pier and San Luis Harbor. Nighttime project lighting shall be shielded and directed downward at Harford Pier to avoid subjecting vessel operators in the vicinity to night blindness. To the extent practicable, the Applicant shall also avoid evening transportation lighting between Port San Luis and the DCPP Access Gate on weekends during the peak tourist season (May through October).

Findings: The aforementioned mitigation measures along with mitigation incorporated into the project description reduce the impact to a level of insignificance.

Supportive Evidence: Viewers with high levels of concern and visual exposure at Harford Pier and other recreation-oriented viewpoints on and around San Luis Obispo Bay would experience highly prominent short-term views of the RSGs and transporters at foreground

distances. This temporary impact would persist for up to four days during each year of RSG delivery as the RSGs are offloaded at Port San Luis and transported onto the access road on PG&E property at Access Gate. At these near foreground distances, the project would have strong levels of visual contrast and visual change. Seasonal timing and weather would substantially affect the level of expected viewer sensitivity. According to the Port San Luis Harbor District Port Master Plan, the peak tourist period at the Port occurs from May through October, especially during, but not limited to, weekends and periods of good weather. Offloading operations in either September or October 2007 (for Unit 2) or 2008 (for Unit 1) could thus potentially occur during peak visitor periods at the Port. However, the number of viewers would most likely be considerably higher during the June through August period, than during off-season periods. Due to the limited duration of viewer exposure to the RSGs, and the likelihood that such exposures would represent one-time experiences for most visitors, the overall sensitivity of viewers to this impact is considered to be low to moderate during off-season periods. During peak season weekends, because of the anticipated large number of visitors and the high sensitivity of both visitors and businesses to even short-term disruption from the project, overall sensitivity is considered to be moderate to high. Thus, in the worst cases, during peak season weekends, the offloading and transport activities could prove disruptive to normal recreational activities at Harford Pier and vicinity, and represent a potentially significant impact to visitors and businesses. RSG offloading and transport activities could include nighttime operations, requiring bright artificial illumination. Because recreational activities in and around Harford Pier take place during both the day and evening, these temporary impacts could also occur during both day and evenings and include potentially significant impacts from project-related nighttime light and glare.

To address night lighting that might adversely affect port use, PG&E proposes to shield lighting and direct it away from sensitive areas. To ensure that this measure would be implemented to the satisfaction of the Port San Luis Harbor District administrators, especially in the vicinity of Harford Pier, additional clarification of PG&E's proposed measure is needed. Mitigation is identified below for providing further guidance and procedures to reduce potential impacts associated with night lighting near Harford Pier.

With measures to ensure off-season offloading and minimized glare (Mitigation Measures V-1a and V-1b), and a measure to provide advance notice of the offloading activities (Mitigation Measure N-1a), the character and use of the special coastal community of Port San Luis, and particularly of the Harford Pier area, would be protected from temporary adverse visual impacts. These measures would reduce impacts to less than significant levels.

VII. Cumulative and Growth Inducing Impacts

Cumulative Impacts

State CEQA Guidelines Section 15355 defines cumulative impacts as

> "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts". Further, "the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time".

The Guidelines require the discussion of cumulative impacts to reflect the severity of the impacts and their likelihood of occurrence. However, the discussion need not be as detailed as the analysis of impacts associated with the project, and should be guided by the rule of reason.

Findings:

The potential for the proposed project to create cumulative effects when the impacts of the proposed project are considered together with the projects listed in the Final EIR and the forecasted population growth for San Luis Obispo County are noted below.

- **Air Quality**

Future and proposed construction projects in close proximity to the Proposed Project could contribute to a cumulative annual increase in regional air pollutant emissions. There is a possibility of a variety of projects, mainly infrastructure improvements or local residential development, to occur within the project time frame. Proposed Project construction activities would take place approximately 7 miles from the cumulative projects in Avila Beach and Port San Luis. Potential transportation-related impacts to air quality would occur over a period of four days within Port San Luis and during transport along Avila Beach Drive to the DCPP facility.

Pollutants generated by construction of the cumulative projects coupled with the emissions associated with residential heating and increased traffic due to local development and increased population growth could further exacerbate the potentially significant, but mitigable, project-related transportation and construction related impacts. The mitigation measures identified for the proposed project impacts would reduce cumulative air quality impacts to a level that would be less than significant. These measures are: A-1a) Develop and implement a trip reduction plan; A-1b) Develop and implement a diesel combustion emission control plan; A-1c) Offset tugboat NOx emission with an offsite mitigation program; A-1d) Conduct an acute health hazard screening analysis for the toxic diesel component acrolein and A-2a) Use registered portable equipment.

- **Biological Resources**

Potentially significant impacts to sensitive vegetation and wildlife could result from residential, commercial, or industrial improvement and development projects in the areas of Avila Beach and Port San Luis. However, a majority of the projects listed in the Final EIR are relatively small in size and generally occur in areas lacking significant native vegetation and wildlife habitat. The area between the cumulative projects and the construction site of the proposed project are separated by nearly 6 miles of undeveloped native habitat. The proposed project would not have any significant, unavoidable effects on biological resources due to the fact that all proposed project activities would be conducted in previously disturbed areas and mitigation could successfully reduce all potentially significant impacts.

The small size of the cumulative projects and their minimal impact on native vegetation and wildlife coupled with the localized effects of the proposed project on terrestrial biological resources suggests that no cumulatively considerable impacts to terrestrial biological resource would occur.

Construction projects in Port San Luis and Avila Beach may have potentially significant impacts to marine waters and organisms, including disruption of sediment (e.g., Port San Luis Ocean Discharge Pipeline Repair and Extension Project). Those projects that would occur concurrently with the offloading of the steam generators in Port San Luis may contribute to the cumulative adverse impacts on marine biological resources. Replacement steam generator offloading within Port San Luis would not cause significant impacts to marine biological resources. The proposed project would facilitate continued operation of DCPP at least through the end of the NRC licenses. No cumulative biological impacts would result from the proposed project.

- **Cultural Resources**

Ongoing and future projects listed in the Final EIR could contribute to cumulative impacts on cultural resources. Increased population growth in the project vicinity may exacerbate the potential for disturbance or illicit take of cultural resources. However, with proper environmental planning and appropriate mitigation, the potential for adverse impacts would be minimized. With the exception of actions completed under statutory or categorical exemptions, specific project actions in San Luis Obispo County would come under CEQA or NEPA review (or both), which requires assessment and mitigation to potential cultural resources impacts. The proposed project would not cause any significant impacts to cultural resources because project activities would occur on previously developed (paved) land. Therefore, there would be no cumulatively considerable impacts on cultural resources resulting from the proposed project.

- **Geology, Soils and Paleontology**

Considering all proposed or pending development in the project area, cumulative geologic impacts consist of potential alteration of the topography, impacts to paleontological resources, and triggering of erosion or slope failures. All of the proposed development in the Port San Luis or Avila Beach areas, and the proposed project, would be subject to unstable slope or soil conditions and seismically induced ground failure in the event of an earthquake on the nearby Hosgri fault zone or other nearby capable faults. Construction of the OSG Storage Facility would contribute only a negligible increase to the potential cumulative geologic impacts. Implementation of recommended mitigation measures related to impacts to geology, soils, and paleontology would minimize the cumulative effects of these impacts to less than significant levels. These measures are: G-1a) Prevent overloading of unstable ground along transport route; G-2a) Protect workers from temporary effects of earthquake shaking; G-2b) Prevent casualties caused by falling rocks; G-3a) Long Term Seismic Program Update and G-4a) Evaluate slope stability in the vicinity of the OSG Storage Facility site.

- **Hazardous Materials**

The Avila Beach area is experiencing an increase in development as a result of a 3-year remediation project conducted by Unocal to prevent surface hydrocarbon exposure. Since the remediation project has been completed, Avila Beach has continued to rebuild. Development projects in the Avila Beach area are not expected to release hazardous materials, and they would be expected to follow measures to protect the integrity of the remediation efforts in the area. Because the proposed project activities occur almost exclusively at DCPP, which is approximately 7 miles northwest of Avila Beach, there is no potential for the proposed project to contribute to cumulative adverse hazardous materials impacts in the project vicinity.

Any on-going cleanup and removal of contaminated soil and/or groundwater resulting from other projects would be considered a beneficial impact. Cleanup of contaminated sites related to other projects becomes an adverse impact when the combined volume of contaminated soil requiring treatment from the proposed project and other projects exceeds the capacity of the available treatment facilities. However, no significant quantities of contaminated soil are expected to be encountered during the proposed project timeframe, resulting in a less than significant impact. With implementation of the recommended mitigation measures, the effects of the proposed project would not be cumulatively considerable.

- **Hydrology and Water Quality**

Some of the cumulative development projects in the Avila Beach and Port San Luis areas may result in ground disturbance, locally increased runoff due to the increase in impervious surfaces, and the potential for sediment loading and contaminant spills. These potential

activities may result in adverse impacts to local drainages and San Luis Obispo Bay. Because DCPP is located approximately 7 miles northeast of the planned cumulative development projects, construction-related impacts of the proposed project would be isolated from these hydrological features. The proposed project would result in minimal ground disturbance and erosion, as the construction and transportation components of the project would occur on previously paved land. However, there is the potential for accidental release of petroleum products, which could adversely impact the Diablo Creek watershed and the Pacific Ocean.

Impacts of the proposed project to hydrology and water quality would not be considered significant. Each of the projects listed in the Final EIR would be subject to NPDES stormwater regulations, which mandate a stormwater pollution prevention plan to mitigate any potential impacts to hydrology and water quality. These measures coupled with the isolated location of DCPP and proper implementation of mitigation measures (H-1a, H-1b, and H-2a) diminish any potential for the proposed project's effects on hydrology and water quality to be cumulatively considerable.

- **Land Use, Recreation and Agriculture**

The proposed project's impacts to land use, recreation, and agriculture would be temporary and localized, resulting from disruptions associated with transport activities or the increased recreation needs of a temporarily larger workforce required to complete the proposed project. The proposed project would not contribute to long-term cumulative impacts to land use, recreation, or agriculture as continued operation of DCPP would be the same as prior to the project, with the exception of having the OSG Storage Facility onsite. The majority of the projects listed in the Final EIR, which are representative of the ongoing level of development in the region, would be located in areas away from the proposed project's area of impact and would not affect the same lands. As the only permanent structure associated with the proposed project is the OSG Storage Facility, which would be built on previously disturbed land, the proposed project would not contribute cumulatively with the projects listed in the Final EIR toward a loss of recreation or agricultural lands. Consequently, the proposed project would not result in cumulative impacts to land use, recreation, or agriculture.

- **Noise and Vibration**

Future and proposed construction projects in close temporal and spatial proximity to the proposed project could have cumulative noise impacts within the project area. Noise impacts of the proposed project would result from additional trucks on the roads and the use of heavy machinery in the Port San Luis and Avila Beach areas during RSG offloading and transport, which would occur over a period of four days for each delivery. There is a possibility for a variety of projects, mainly roadway improvements or local development, to occur at the same time as RSG offloading and transport. While noise would temporarily increase during offloading and transport of the steam generators, there would be no cumulative construction noise impacts from the proposed project, because all project-related construction would occur at the DCPP site. Due to the relatively isolated location of DCPP, construction noise

from the proposed project would not be audible from Avila Beach or Port San Luis. Offsite traffic noise from the proposed project could combine with the construction noise from roadway improvement or local development projects to locally increase noise levels. However, this increase would be only temporary for the time of project overlap, which would be a maximum of about fifteen months at any given location.

- **Public Services and Utilities**

Some of the development projects listed in the Final EIR would increase local population growth and may result in increased demands on public services and utilities. The demands made by the proposed project on public services and utilities during construction would be within the capacities and capabilities of existing service and utility providers. After the proposed project returns to service, the demand for utilities would return to pre-project conditions at DCPP. Updates to emergency plans could identify an increased need of special equipment for public service providers and would call for the procurement of that equipment. Other additional public service demands are not anticipated. While the proposed project could require additional specialized equipment for public service providers, this specialized equipment is unlikely to be necessary for other projects listed in the Final EIR. Overall, the proposed project's contribution to the demand on public services and utilities would not be cumulatively considerable.

- **Socioeconomics**

The proposed project, along with other proposed or future projects in the proposed project vicinity could result in cumulative impacts to socioeconomics if they were to significantly contribute to a cumulative, substantial population growth, demand for housing, or displacement of people or housing.

Residential development projects planned in the area would directly increase local population growth. However, the proposed project would have no significant impact on population growth in the area. The contribution of the proposed project to population growth, demand for housing or displacement of people or housing would not be cumulatively considerable, as no additional permanent workers would be brought into the area.

- **System and Transportation Safety**

Barges that would deliver the RSGs to Port San Luis may pose a temporary navigational hazard within Port San Luis, especially if other projects are utilizing Port San Luis concurrently. With implementation of the mitigation measures (Mitigation Measure S-1a, Barge Navigational Safety Plan) recommended in the Final EIR, effects of the proposed project on transportation safety would not be cumulatively considerable.

- **Traffic and Circulation**

Future and proposed construction projects in close proximity to the proposed project could have cumulative traffic and circulation impacts within the Study Area, depending on location, intensity, and scheduling. Construction to widen the San Luis Obispo Creek Bridge may potentially intensify cumulative traffic impacts on Avila Beach Drive, which would be used by temporary DCPP workers during the proposed project. Widening of the San Luis Obispo Creek Bridge is tentatively planned to be finished in 2006 or the beginning of 2007, and therefore, should not interfere with the proposed project.

Construction of the cumulative projects and a forecasted increase in regional population growth could further exacerbate the short-term potentially significant circulation and traffic impacts associated with construction of the proposed project (Impacts T-1, T-2, and T-3). However, the mitigation measures recommended for the proposed project would reduce cumulative traffic and circulation impacts to a less than significant level. These measures are: T-2a) Avoid travel during peak season on Avila Beach Drive; T-2b) Avoid travel during peak time on Highway 101; T-3a) Develop a trip reduction program and T-3b) Avoid travel during peak season on Avila Beach Drive and San Luis Bay Drive.

- **Visual Resources**

Cumulative impacts to visual resources would occur where project facilities or actions would be viewed in combination with other past, present, or foreseeable future developments. The significance of cumulative visual impacts would depend on: the degree to which the viewshed is altered; the degree to which visibility of scenic resources is impaired due to either view obstruction or direct impacts to scenic resource features; and the degree to which visual contrast or dominance is increased, due to visibility of the project in combination with other foreseeable projects.

The principal visual impacts of the proposed project would be short-term and temporary during the period when the RSGs are being offloaded at Port San Luis and transported to DCPP. These short-term impacts would not be experienced in combination with other currently foreseeable cumulative projects. Under the proposed project, the temporary and permanent structures that would be erected at DCPP would not be visible from the viewshed of Avila Beach and Port San Luis projects listed in the Final EIR. Therefore, the proposed project would not contribute to cumulative visual impacts.

Growth-Inducing Impacts

Section 15126(g) of the State CEQA Guidelines requires that an EIR assess a project's potential to induce additional economic or population growth or the construction of additional infrastructure or housing beyond that anticipated for the project itself. The Guidelines state that a project will have a significant growth-inducing impact if:

- It directly or indirectly fosters economic or population growth or additional housing; or,
- It removes obstacles to growth; or,
- It taxes community services facilities; or,
- It encourages or facilitates other activities that cause significant environmental effects.

The Guidelines define a growth-inducing impact as:

> "the way in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are [public works] projects which would remove obstacles to population growth. Growth is not assumed to be necessarily beneficial, detrimental, or of little significance to the environment."

Findings:

The construction of the proposed project would not permanently affect the employment patterns in the area. PG&E would temporarily employ approximately 30 additional workers during transport, 100 to 700 additional workers during the staging and preparation phase and up to 900 additional workers during the removal and installation phases of the Proposed Project. The peak employment requirement of 900 additional workers would occur during the replacement of the original steam generators (OSGs) during which another 1,285 other temporary workers would be replacing spent fuel rods at DCPP. While refueling would occur in the baseline scenario and is not part of the proposed project, the combined impacts resulting from all 2,185 additional workers need to be considered for purposes of this analysis because refueling would occur at the same time as the proposed project. The 1,285 workers required to replace spent fuel rods are generally part of the local labor force who return to DCPP every 18 months during refueling outages, while the proposed project would involve up to 900 additional workers who would not return at successive outages. With the proposed project, up to approximately 2,185 additional temporary workers would be at DCPP compared to a non-outage normal period.

The specialists and laborers, who would be temporarily employed for the various proposed project phases, would be based both locally and outside of a 2-hour commute area of the proposed project. Existing hotels or other temporary accommodations would be available in the area to house outside contractors. There is an adequate supply of lodging within a 25-mile radius to support this temporary increase of commuting workers for all phases of the proposed project. In addition, the traffic and transportation circulation system in the vicinity of the proposed project, and the area's utilities and public services have adequate capacity for the additional 2,185 temporary workers (proposed project plus concurrent refueling workers).

Proposed project operation and maintenance would be performed by current PG&E employees and therefore would not create new jobs.

VIII. Findings Regarding Alternatives to the Proposed Project

The Final EIR presents alternatives to the following proposed project components: (1) transportation of the replacement steam generators (RSGs); (2) RSG staging and preparation; and (3) original steam generator (OSG) removal, transport, and storage. There are various alternatives to the components of the proposed project as well as the No Project Alternative. There is one alternative to the RSG transport phase; three alternatives to the RSG staging and preparation phase and five alternatives to the OSG removal and storage phase, four of which consist of different locations for the OSG Storage Facility and one that would transport the OSGs offsite for disposal.

The following is a discussion of each alternative and a determination of whether the proposed project or an alternative is considered to be environmentally superior within each component of the project. Thirteen issue areas utilized in the Final EIR were considered during analysis of the alternatives.

- **No Project Alternative**

The No Project Alternative involves the continued use of the DCPP Original Steam Generators (OSGs) through 2013 or 2014 at which time the OSGs are anticipated to reach the end of their useful lives. Approximately 2,200 MW of base-load system generation capacity for PG&E customers would need to be replaced at that time. Although replacement facilities would be needed, early shutdown of DCPP would result in some beneficial safety and environmental impacts in the vicinity of DCPP. The No Project Alternative results in the following needs:

- Replacement Generation Facilities: In the future, environmental and safety concerns will most likely preclude the construction of new nuclear, hydroelectric, and coal- and oil-fired power plants as replacement generation, therefore PG&E has stated that it would need to construct 4 or 5 combined cycle gas turbine power plants in northern California and southern Central Valley. At this time, the details of such projects are unknown, and therefore it would be difficult to determine any definite impacts. However, it is known approximately how much land would be required to construct a combined cycle power plant, how much water would be needed to provide sufficient cooling, and how much natural gas would be used to operate the new facilities. This information could be used to determine potential impacts to areas such as biological resources, hydrology and water quality, and air quality.

- Replacement Transmission Facilities: New transmission facilities would need to be built for any new generation capacity constructed, but new transmission facilities could also be used as a substitute for some in-State generation if access to generation in the Pacific Northwest and the Southwest is improved. Currently the details of potential transmission projects are not known; however, in general these projects produce short-term impacts during construction and long-term

impacts during operation of the transmission line. Short-term impacts include air and noise emissions, loss of biological habitat, traffic disruption, and potential disruption of utility service. Long-term impacts include visibility of transmission infrastructure, corona noise, permanent loss of biological habitat or cultural resources, and potential changes in electric and magnetic fields.

- Alternative Energy Technologies: Options for replacement generation include principal renewable and other alternative energy technologies such as solar thermal, photovoltaics, wind, geothermal, hydropower, fuel cells, and biomass. The main benefit of these technologies is that they do not rely on fossil fuel, consume little water, and generate either zero or reduced levels of air pollutants and hazardous wastes. However these technologies do create some environmental impacts such as permanent disturbance or destruction of habitat, visual changes, generation of hazardous waste, noise production, endangerment of wildlife and fish, poor water quality due sedimentation and turbidity, change of land uses, and some air emissions.

- System Enhancement Options: This option would not require the construction of new major generation or transmission facilities, but rather reduce the need for additional base-load energy. This would be accomplished through energy conservation or demand-side management, and distributed generation or generation through facilities providing less than 50 MW in capacity. While this option would not provide for full replacement of the energy lost due to shutdown of DCPP, it would allow for offset of a small percentage of the lost energy supply. This option is the most uncertain and unreliable in terms of generation capacity or savings, opportunity for growth, and specific potential uses.

Findings:

In comparison, long-term impacts for many environmental issue areas could occur under the No Project Alternative. Construction of new power plants, including alternative energy technologies under the No Project Alternative would likely result in some level of short-term (construction) and long-term (operation) regional impacts to air quality, biological resources, water quality, noise, hazardous waste, public health, and visual resources. Overall, the Environmentally Superior Alternative is preferred over the No Project Alternative.

- **Replacement Steam Generator Offloading Alternative**

The proposed RSG offloading location is at Port San Luis with the associated transport route to the temporary staging area (TSA) at DCPP along the seven-mile DCPP Access Road. The RSG Offloading Alternative is at the DCPP Intake Cove, which would allow the steam generators to be delivered directly to the DCPP facility and then moved a short distance on existing facility roads to the TSA.

The RSG Offloading Alternative would eliminate potential land use and recreation, system and transportation safety and visual resources impacts associated with the proposed project. Offloading the RSGs at the Intake Cove would avoid conflicts with land- and water-based traffic near Port San Luis associated with commercial and recreational vessel moorings, local restaurant and shop traffic near Harford Pier and DCPP employee traffic along the Access Road. Use of the Intake Cove would also reduce the visual impacts from nighttime lighting in Port San Luis during the RSG offloading and transporting activities. The navigational and transportation safety impacts to the general public would be removed because of the isolated location of the DCPP Intake Cove. The Intake Cove Alternative would also eliminate potential land use conflicts with the San Luis Obispo County local coastal policies that dictate coastal and recreational resource access. In addition, the Intake Cove Alternative would not impede emergency vehicle access to the DCPP facility because the RSG transport equipment would not utilize the DCPP Access Road or pass through the Access Gate.

Air quality and noise impacts could be reduced by avoiding offloading and transport activities in the vicinity of the publicly accessible Port San Luis and the community of Avila Beach. Emissions of air pollutants from offloading and transport activities under the Intake Cove Alternative would be less than the proposed project because of the shorter distance between the offloading location and the TSA. With regard to noise, use of the Intake Cove would impact fewer individuals during transport activities because the Intake Cove is isolated from the general public.

Proposed Project vs. Replacement Steam Generator Offloading Alternative

Issue Area	Proposed Project (Port San Luis)	RSG Offloading Alternative (Intake Cove)
Air Quality	Greater exposure to public and residences and longer transport route	**Preferred** because of reduced level of emissions due to shorter distance. Limited exposure to the public
Biological Resources	Slightly more severe impacts due to longer transport route and presence of native vegetation along route	**Slightly Preferred** because of slight reduction in impacts due to shorter transport route with limited native vegetation in the area
Cultural Resources	No Preference	No Preference
Geology, Soils and Paleontology	Greater likelihood of instabilities and exceeding weight capacity along transport route	**Preferred** because of reduced likelihood of encountering unstable locations along transport route
Hazardous Materials	No Preference	No Preference
Hydrology and Water Quality	No Preference	No Preference
Land Use and Recreation	Requires limiting access to Port San Luis public facilities and recreational resources	**Preferred** because of elimination of land use and recreation access restriction impacts
Noise and Vibration	Closer proximity to general public and community creating greater exposure of sensitive receptors to noise impacts	**Preferred** because of reduced exposure of sensitive receptors and general public to noise impacts
Public Services and Utilities	Greater likelihood of impeding emergency vehicle access to DCPP. RSG would need to be transported along the DCPP Access Road	**Preferred** because of reduced impediments to emergency vehicle access to DCPP
Socioeconomics	Potential temporary displacement or disruption of Port San Luis businesses or fishermen	**Slightly Preferred** because of avoidance of any potential displacement or disruption impacts to Port San Luis businesses or fishermen
System and Transportation Safety	Navigational hazard in Port San Luis and impediment to emergency vehicles during transport. RSGS would need to be transported along the DCPP Access Road	**Preferred** because of elimination of navigational hazards and reduced obstruction to emergency vehicles
Traffic and Circulation	Disruption of traffic flow and restricted access to public roadway and parking areas	**Preferred** because of elimination of traffic impacts due to offloading activities. Reduction in traffic impacts along DCPP Access Road
Visual Resources	Short-term visual impacts to viewers at Port San Luis	**Preferred** because of elimination of visual impacts to general public from offloading activities

- **Temporary Staging Area Alternatives**

The proposed project and the three Temporary Staging Area (TSA) Alternatives would all be located in the southwestern portion of the DCPP facility site. The TSA location for the proposed project would be in Parking Lot 1. Each TSA alternative would be located between approximately 100 and 1,500 feet northwest of the proposed project in Parking Lots 7 and 8 or within an existing warehouse north of Parking Lot 1. Due to the proximity of the proposed project to TSA Alternatives, most impacts would be similar for all locations. There would be a slight preference for TSA Alternatives B and C over the proposed project because native vegetation exists adjacent to Parking Lot 1. This native vegetation is located outside of the proposed TSA area where construction would take place for the proposed project. TSA

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Alternative B would also be slightly preferred over the proposed project and the other TSA Alternatives because it would be located the furthest from Patton Cove, which has experienced landslides.

Proposed Project vs. Temporary Staging Area Alternatives

Issue Area	Proposed Project	TSA Alternative A	TSA Alternative B	TSA Alternative C
Air Quality	No Preference	No Preference	No Preference	No Preference
Biological Resources	Construction activities may disturb adjacent native vegetation	**Slightly Preferred** because of slight reduction of impacts by locating alternative further from native vegetation	**Slightly Preferred** because of slight reduction of impacts by locating alternative further from native vegetation	Impacts would be similar to Proposed Project
Cultural Resources	No Preference	No Preference	No Preference	No Preference
Geology, Soils and Paleontology	Closest to potential landslide area at Patton Cove	Close to potential landslide area at Patton Cove	**Slightly Preferred** because of greater distance from potential landslide area at Patton Cove	Close to potential landslide area at Patton Cove
Hazardous Materials	No Preference	No Preference	No Preference	No Preference
Hydrology and Water Quality	No Preference	No Preference	No Preference	No Preference
Land Use and Recreation	No Preference	No Preference	No Preference	No Preference
Noise and Vibration	No Preference	No Preference	No Preference	No Preference
Public Services and Utilities	No Preference	No Preference	No Preference	No Preference
Socioeconomics	No Preference	No Preference	No Preference	No Preference
System and Transportation Safety	No Preference	No Preference	No Preference	No Preference
Traffic and Circulation	No Preference	No Preference	No Preference	No Preference
Visual Resources	No Preference	No Preference	No Preference	No Preference

- **Original Steam Generator Storage Facility Location Alternatives**

The proposed project and all the OSG Storage Facility Location Alternatives would be located in the northeastern section of the DCPP facility site near the 500 kV switchyard. The proposed project would place the OSG Storage Facility northeast of the intersection of Oak Tree Lane and Reservoir Road adjacent to the 500 kV switchyard. OSG Storage Facility Location Alternative A would be located in the northeast corner of the switchyard. The other three OSG Storage Facility Location Alternatives would be located east of the proposed project. The proposed project and all of the OSG Storage Facility Location Alternatives would all be located within approximately 600 to 700 feet of one another.

The proposed project and the OSG Storage Facility Location Alternatives would have many of the same impacts. Hydrologic and water quality impacts, such as contamination of

stormwater runoff due to sedimentation or leaks from construction activities or water quality degradation due to potential damage to the OSG Storage Facility from Diablo Creek flow overtopping its banks, could be reduced with Alternatives C and D.

Proposed Project vs. OSG Storage Facility Location Alternatives

Issue Area	Proposed Project	OSG Storage Facility Location Alternative A	OSG Storage Facility Location Alternative B	OSG Storage Facility Location Alternative C	OSG Storage Facility Location Alternative D
Air Quality	No Preference	No Preference	No Preference	No Preference	No Preference
Biological Resources	**Slightly Preferred** because of greater distance from Diablo Creek and native vegetation	Greater likelihood of impacts due to proximity to Diablo Creek	**Slightly Preferred** because of greater distance from native vegetation	Greater likelihood of impacts due to proximity to native vegetation	Greater likelihood of impacts due to proximity to native vegetation
Cultural Resources	No Preference	No Preference	No Preference	No Preference	No Preference
Geology, Soils and Paleontology	Greater likelihood of being affected by potential bluff instabilities over Diablo Creek	Greater likelihood of being affected by potential bluff instabilities over Diablo Creek	Greater likelihood of being affected by potential bluff instabilities over Diablo Creek	**Preferred** because of reduced likelihood of effects from bluff instabilities	**Preferred** because of reduced likelihood of effects from bluff instabilities
Hazardous Materials	No Preference	No Preference	No Preference	No Preference	No Preference
Hydrology and Water Quality	Outside main flow path, but more likely to be affected by overflow Diablo Creek	Within main flow path of Diablo Creek, greater likelihood of effects from Creek overflow	Outside main flow path, but more likely to be affected by overflow Diablo Creek	**Preferred** because of reduced likelihood of effects from Diablo Creek overflow	**Preferred** because of reduced likelihood of effects from Diablo Creek overflow
Land Use and Recreation	No Preference	No Preference	No Preference	No Preference	No Preference
Noise and Vibration	No Preference	No Preference	No Preference	No Preference	No Preference
Public Services and Utilities	No Preference	No Preference	No Preference	No Preference	No Preference
Socioeconomics	No Preference	No Preference	No Preference	No Preference	No Preference
System and Transportation Safety	No Preference	No Preference	No Preference	No Preference	No Preference
Traffic and Circulation	No Preference	No Preference	No Preference	No Preference	No Preference
Visual Resources	No Preference	No Preference	No Preference	No Preference	No Preference

- **Original Steam Generator Offsite Disposal Alternative**

The alternative to storing the Original Steam Generators (OSGs) onsite at an OSG Storage Facility would be to transport the OSGs offsite for permanent disposal at a facility that accepts low-level radioactive waste. This approach would be similar to that proposed by Southern California Edison (SCE) for the Steam Generator Replacement Project at San Onofre Nuclear Generating Station (SONGS). Under this alternative, the most logical approach would be to transport the OSGs by barge from either the Intake Cove or Port San

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Luis to the disposal facility or to a transfer point where they would be shifted to a different mode of transportation such as railway for ultimate delivery to the facility. Currently, disposal facilities for this type of waste exist in Washington, Utah and South Carolina.

Detailed information on the potential impacts and their severity associated with this alternative is not currently available due to the lack of specific details for the offsite disposal method. This alternative would eliminate or reduce potential construction impacts of the proposed project because construction of the OSG Storage Facility would not occur. However, offsite disposal would involve similar or possibly more severe impacts at the disposal site. There would also be impacts due to the transportation of the low-level radioactive OSGs offsite, which could bring safety hazards closer to the general public. In addition, this alternative may create new impacts at the selected disposal facility.

The primary area of concern for offsite disposal would be system and transportation safety. Offsite transport of the OSGs would increase the navigational hazard caused by transport barges and would introduce a new, but mitigable, impact of potential residual contamination radiation exposure to the public near the disposal transport route. The NRC and Federal Department of Transportation (DOT) regulate the use and transport of nuclear materials and protection of public safety and would, therefore, regulate the transport of OSGs offsite.

Onsite OSG Storage Facility Locations vs. OSG Offsite Disposal Alternative

Issue Area	Onsite Storage	Disposal of OSG Offsite Disposal Alternative
Air Quality	**Slightly Preferred** over the OSG Offsite Disposal Alternative. Short-term air quality from construction, no potential impacts to general public	Greater likelihood of impacts to sensitive receptors form transport of the OSGs offsite
Biological Resources	**Slightly Preferred (Proposed Project or Alternative B)** potential to impact local native vegetation, however, no potential marine resource issues would be impacted	Less impacts to native vegetation at DCPP facility; potential impacts at disposal facility and greater potential marine impacts with barge transport of the OSGs
Cultural Resources	No Preference	No Preference
Geology, Soils and Paleontology	Potential bluff instabilities associated with Proposed Project and alternatives	**Slightly Preferred** because less potential impacts at DCPP facility; potential impacts at disposal facility
Hazardous Materials	**Preferred** over the OSG Offsite Disposal Alternative. Less likely of a hazardous material spill during transportation – shorter distance to OSG Storage Facility	More potential impacts due to long transport distance and exposure to general public.
Hydrology and Water Quality	**Slightly Preferred (Alternatives C or D)** because of reduced likelihood of effects from Diablo Creek overflow	Potential impacts from an accident during transport of the OSGs
Land Use and Recreation	**Preferred** over the OSG Offsite Disposal Alternative	Requires limiting public access to public facilities (e.g., Port San Luis) and recreational resources during transport of OSGs
Noise and Vibration	**Preferred** over the OSG Offsite Disposal Alternative. Short-term noise from construction, no potential impacts to general public	Greater likelihood of impacts to sensitive receptors during transport of OSGs
Public Services and Utilities	**Preferred** over the OSG Offsite Disposal Alternative. Less likely to impact services and utilities	Greater likelihood of impeding emergency vehicle access to DCPP, particularly if OSGs are removed via the Access Road
Socio-economics	No Preference	No Preference
System and Transportation Safety	**Preferred** over the OSG Offsite Disposal Alternative. Less likely for exposure to general public	More potential impacts due to long transport distance and exposure to general public
Traffic and Circulation	**Preferred** over the OSG Offsite Disposal Alternative No traffic issues associated with the OSG Storage Facility	Greater likelihood of impacts in public roadways and boating areas during transport of OSG
Visual Resources	**Preferred** over the OSG Offsite Disposal Alternative. Limited visual resource issues associated with OSG Storage Facility	Greater likelihood of impacts to sensitive viewers during loading activities

- **Environmentally Superior Alternative**

The only superior alternative would be the Intake Cove Offloading Alternative. Except for a few minor beneficial differences, there would be no preferred alternative for the other phases of the project.

Findings:

The RSG Offloading Alternative at the Intake Cove is the preferred alternative because it would substantially reduce impacts related to land use and recreation, system and transportation safety and visual resources. Because the RSGs would be offloaded directly at the DCPP site, use of Port San Luis and the DCPP Access Road would be avoided thereby eliminating a number of potentially significant impacts in these areas. Additionally, the alternative which utilizes Intake Cove for offloading activities will also reduce the severity of impacts to air quality, noise, public services, system and transportation safety, traffic and circulation, and biological resources.

There is no preferred alternative for the Temporary Staging Area (TSA) location. The proposed project and alternatives analyzed in the Final EIR would result in similar environmental impacts because of the proximity of the alternative locations. However, in some environmental issue areas there were minor differences between the alternatives which would make one or two alternatives preferred over the others. TSA Alternatives A and B would reduce the minor potential impacts associated with the disturbance of adjacent native vegetation. TSA Alternative B would also be located furthest from the Patton Cove landslide area, an identified geologic hazard. While not considered an environmentally superior alternative, Alternative B could reduce some minor environmental and safety concerns.

There is no preferred alternative for the Original Steam Generator (OSG) Storage Facility, however, onsite storage of the OSGs is preferred over offsite disposal. The proposed project and the OSG Storage Facility Alternatives would result in similar impacts because of the proximity to the alternative locations. However, in some environmental issue areas there were minor differences between these alternatives, which would make one or two alternatives preferred over the others. Alternative B would reduce the minor potential impacts associated with the disturbance of adjacent native vegetation, however, Alternative B would be located closest to Diablo Creek resulting in greater hydrological impacts. Alternatives C and D would reduce potential hydrologic, water quality and geologic impacts by locating the OSG Storage Facility furthest from Diablo Creek.

While not considered environmentally superior alternatives, each OSG Storage Facility Location Alternative is preferred over the OSG Offsite Disposal Alternative. Among the potential OSG Storage Facility optional locations, Alternatives C and D may reduce some environmental and safety concerns.

The Environmentally Superior Alternative would consist of replacement steam generator delivery and offloading to the Intake Cove, any of the TSA locations, and any of the onsite OSG Storage Facility locations as there are no substantial differences among the TSA locations or the onsite OSG Storage Facility locations. As noted above, OSG Storage Facility Location Alternatives C and D would have minor benefits as compared to the proposed project with regard to hydrology and water quality, while TSA Alternative B could reduce some minor environmental and safety concerns. Offloading the steam generators at the

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Intake Cove would eliminate certain short-term project-related impacts to land use and recreation, public services and utilities, system transportation safety, traffic and circulation and visual resources. The Environmentally Superior Alternative would be located entirely within DCPP property at the DCPP Intake Cove, which is isolated from the general public due to regulation, distance, and geography.

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IX. Mitigation Monitoring And Reporting Program

Section 21081.6 of the Public Resources Code requires that when a public agency is making findings required by State CEQA Guidelines Section 15091(a)(1), codified as Section 21081(a) of the Public Resources Code, the public agency shall adopt a reporting or monitoring program for the changes to the proposed project which it has adopted or made a condition of approval, in order to mitigate or avoid significant effects on the environment.

The Planning Commission hereby finds and accepts that the Mitigation Monitoring Program for the Diablo Canyon Power Plant Steam Generator Replacement Project attached to these Findings meets the requirements of Section 21081.6 of the Public Resources Code by providing for the implementation and monitoring of mitigation measures intended to mitigate potential environmental effects.

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EXHIBIT B FINDINGS
DRC2004-00165
COASTAL DEVELOPMENT PERMIT

Coastal Development Permit

A. The proposed project or use is consistent with the San Luis Obispo County General Plan because:

1. The proposed project, as conditioned is consistent with the Coastal Plan Policies of the Local Coastal program (Land Use Element of the General Plan) because:

a. Shoreline access policies (Chapter 2 of the Coastal Policy Document) require the provision of public shoreline access as part of the approval of the proposed project.

The proposed project has been conditioned to and the applicant has agreed to provide for future shoreline access as required by chapter of the Coastal Policy Document, a series of coastal access enhancement projects to be funded by the applicant. These access enhancement projects are:

i. funding to finish driveway construction to the Point San Luis Lighthouse;
ii. removing barriers to open coastal access at the power plant main gate;
iii. purchase of vehicles to use the improved lighthouse driveway;
iv. funding of Avila Port coastal pathway; and
v. an access easement document dedicating the access driveway to the Lighthouse.

b. Energy and Industrial Development Policy 1 states that expansion of existing industrial or energy related development on existing sites shall have priority over opening of additional areas to new development. The proposed project is being carried out in support of the existing plant and is not a new site.

c. Recreation and Visitor Serving Facilities Policies encourage the preservation of existing facilities and expansion of such opportunities. The low level recreational facilities in the vicinity of the site includes the Point San Luis Lighthouse. Improved access to this site and expansion of the opportunities to use the site have been conditioned as part of the project.

d. Commercial Fishing and Recreational Boating policies encourage protection of such opportunities. As there are no boating facilities in the vicinity of the project, it is determined that the project will not have any adverse effect on fishing or boating.

e. Environmentally Sensitive Habitat policies require protection of such areas. The project is located in an ESHA which is identified as the

Coastal Terrace of the Irish Hills SRA. The precise project site does not support sensitive habitats.

f. Agriculture policies encourage the preservation of viable agriculture. The proposed project is found to have no effect on agricultural operations in the vicinity.

g. Public Works policies ensure that adequate facilities are available for new and anticipated development. The proposed project will not increase the demand for services.

h. Coastal Watershed policies are meant to maintain productivity of coastal waters and to manage new development so that the resource is maintained. The proposed project, with the recommended conditions of approval, will not have a significant effect on watersheds.

i. Visual and Scenic Resource policies encourage protection of coastal viewsheds. The proposed project is located amidst a large industrial facility and will not have minimal visual effect.

j. Hazard policies provide for the protection of life and property from human and man made hazards. The location of the proposed project will not increase the risk of hazard to the public or property.

k. Archaeology polices relate to the identification and preservation of archaeological resources. The proposed project location is not known to contain archeological resources. Monitoring of ground disturbing activities is required.

l. Air Quality policies encourage and enhancement of air quality. Compliance with the conditions of approval and APCD rules will preserve air quality.

2. The project as conditioned is consistent with the San Luis Bay (Coastal) Area Plan because:

   a. The proposed project complies with Planning Area standards contained in the Area Pan because:

      i. Access to the site remains in control of the applicant and development of adjacent lands does not provide access to the power plant.
      ii. Public access to the Lighthouse is not affected by this application.

B. As conditioned, the proposed project or use satisfies all applicable provisions of Title 23 of the County Code because:

1. Section 23.04.420 et seq. states "Development within the Coastal Zone between the first public road and the tidelands shall protect and/or provide coastal access as required by this section". The proposed project is located between the first public road and tidelands and therefore must provide for coastal access.

2. The applicant has offered to fund several coastal access projects ion or near the site. These projects meet the applicant's responsibility to provide public access to the coast per Title 23.

C. The establishment and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use because:

1. Seismic hazards have been taken into account in the design and location of the proposed project.

2. The 12,000 acres surrounding the immediate project site is largely uninhabited.

3. The OSG Facility project is a significant project that will require a large number of workers and major construction processes. With this type of construction project, fire protection and rescue problems will occur that must be mitigated. The review of the proposed project by public safety agency has determined that existing fire safety systems do not meet currently recognized national, state and /or local standards. The addition of the proposed project's buildings, both permanent and temporary, will further require improvement of the overall fire protection systems. In order to protect the public health and safety, the fire protection systems at the facility and first responders must be upgraded to current recognized standards.

D. The proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development because:

1. The primary use of the site is a power plant that will be allowed to continue operations due to the project.

2. The immediate project site is designated EX in the County General Plan and the proposed project is directly related to the EX use.

3. The proposed project site is surrounded on all sides by undeveloped lands that will remain undeveloped.

E. The proposed project or use will not generate a volume of traffic beyond the safe capacity of all roads providing access to the project, either existing or to be improved with the project because Avila Beach Road, a collector road constructed to a level able to handle any additional traffic associated with the project because according to section D.13 of the FEIR, all roads in the vicinity of the proposed project will operate at a level of service C or better.

Sensitive Resource Area

The proposed project site is located within an Environmentally Sensitive Habitat area (ESHA). The ESHA is a Sensitive Resource Area (SRA) identified in San Luis Bay Area Plan (Coastal) as Coastal Terrace of the Irish Hills SRA.

F. The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design, because the proposed

project area is relatively small when compared to the 11,000 acres contained in the SRA boundary. Additionally, the precise sites of all proposed structures are in previously disturbed and/or paved areas.

G. Natural features and topography have been considered in the design and siting of all proposed physical improvements because the proposed project site has already been disturbed for construction of power plant uses.

H. The proposed clearing of topsoil, trees, is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource, because the proposed project site is relatively compact and will utilize best management practices to minimizing grading and erosion effects.

I. The soil and subsoil conditions are suitable for any proposed excavation and site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff, because best management practices will be used.

EX - Combining Designation

J. The proposed use will not adversely affect the continued operation or expansion of the energy or extraction use because:

1. The proposed project's purpose is to replace major components of the power plant and to store the original steam generators in a storage building on the site.

2. The construction and operation of the proposed project will have a beneficial effect on the power plant as it will be able to operate more efficiently for the remainder of its license period.

Coastal Access

K. The proposed use is in conformity with the public access and recreation policies of Chapter 3 of the California Coastal Act, because public access from the nearest public roadway to the shoreline and along the coast pursuant to PRC section 30212; subd. (2) has been required as part of this project approval. The applicant shall increase coastal access opportunities in the area by funding construction of coastal accessways, funding purchase of vans, providing access easement to the coast and removing barriers to coastal accessways.

EXHIBIT C
FINDINGS (DRC2004-00166)
CONDITIONAL USE PERMIT

Conditional Use Permit

A. The proposed project or use is consistent with the San Luis Obispo County General Plan because the use is an allowed use and as conditioned is consistent with all of the General Plan policies.

B. As conditioned, the proposed project or use satisfies all applicable provisions of Title 22 of the County Code because the proposed use is allowable in the PF designation.

C. The establishment and subsequent operation or conduct of the use will not, because of the circumstances and conditions applied in the particular case, be detrimental to the health, safety or welfare of the general public or persons residing or working in the neighborhood of the use, or be detrimental or injurious to property or improvements in the vicinity of the use because:

1. Seismic hazards have been taken into account in the design and location of the proposed project.

2. The 12,000 acres surrounding the immediate project site is largely uninhabited.

3. The OSG Facility project is a significant project that will require a large number of workers and major construction processes. With this type of construction project, fire protection and rescue problems will occur that must be mitigated. The review of the proposed project by public safety agency has determined that existing fire safety systems do not meet currently recognized national, state and /or local standards. The addition of the proposed project's buildings, both permanent and temporary, will further require improvement of the overall fire protection systems. In order to protect the public health and safety, the fire protection systems at the facility and first responders must be upgraded to current recognized standards.

D. The proposed project or use will not be inconsistent with the character of the immediate neighborhood or contrary to its orderly development because:

1. The primary use of the site is a power plant that will be allowed to continue operations due to the project.

2. The immediate project site is designated EX in the County General Plan and the proposed project is directly related to the EX use.

3. The proposed project site is surrounded on all sides by undeveloped lands that will remain undeveloped.

E. The proposed project or use will not generate a volume of traffic beyond the safe capacity of all roads providing access to the project, either existing or to be improved with the project because Avila Beach Road, a collector road constructed to a level able to handle any additional traffic associated with the project because according to section D.13 of the FEIR, all roads in the vicinity of the proposed project will operate at a level of service C or better.

Sensitive Resource Area

The proposed project site is located within an Environmentally Sensitive Habitat area (ESHA). The ESHA is a Sensitive Resource Area (SRA) identified in San Luis Bay Area Plan (Coastal) as Coastal Terrace of the Irish Hills SRA.

F. The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through the site design, because the proposed project area is relatively small when compared to the 11,000 acres contained in the SRA boundary. Additionally, the precise sites of all proposed structures are in previously disturbed and/or paved areas.

G. Natural features and topography have been considered in the design and siting of all proposed physical improvements because the proposed project site has already been disturbed for construction of power plant uses.

H. The proposed clearing of topsoil, trees, is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource, because the proposed project site is relatively compact and will utilize best management practices to minimizing grading and erosion effects.

I. The soil and subsoil conditions are suitable for any proposed excavation and site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff, because best management practices will be used.

EX - Combining Designation

J. The proposed use will not adversely affect the continued operation or expansion of the energy or extraction use because:

1. The proposed project's purpose is to replace major components of the power plant and to store the original steam generators in a storage building on the site.

2. The construction and operation of the proposed project will have a beneficial effect on the power plant as it will be able to operate more efficiently for the remainder of its license period.

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EXHIBIT D
COASTAL DEVELOPMENT PERMIT
CONDITIONS OF APPROVAL

1. **Approved Development**. This Development Plan/Coastal Development Permit authorizes the construction of temporary structures associated with and in support of the Steam Generator Replacement Project consisting of the Temporary Staging Area (TSA) and the Containment Access Facility (CAF) that include the following elements:

   a. The TSA will consist of the following structures:

      i. A Replacement Steam Generator Storage Facility consisting of the following :

      - Approximate maximum square footage of 10,000 square feet
      - Approximately 30 feet in height
      - Prefabricated sheet metal or frame/fabric exterior material
      - Constructed on a concrete slab on grade with support pedestals

      ii. Warehouse/Materials Laydown Area consisting of the following :

      - Approximate maximum square footage of 15,000 square feet
      - Approximately 25 feet in height
      - Prefabricated sheet metal exterior materials
      - Constructed on a concrete slab

      iii. Fabrication and Weld Test Building consisting of the following :

      - Approximate maximum square footage of 10,000 square feet
      - Approximately 25 feet in height
      - Prefabricated sheet metal exterior materials
      - Constructed on a concrete slab

      iv. Contractor Office Space consisting of the following:

      - Modular structure(s)
      - Approximate cumulative total square footage of 10,000 square feet
      - Approximately 25 feet in height
      - Constructed on existing asphalt surface, blocked in place and anchored

b. The TSA structures will be located within an existing paved parking lot known as Parking Area 7, north and inland of the existing access road and south the power block facilities.

c. The CAF will consist of a 10,000-square-foot modular structure with an approximate height of 15 feet. The CAF will be placed upon the existing asphalt surface, blocked in place, and anchored.

d. The CAF will be located on an existing paved area, west of the power block facility.

e. The TSA and CAF will be constructed as needed by the project during 2006 through 2008 (depending upon when the permit is issued).

f. All facilities will be removed at the end of the project needs or by December 31, 2010 whichever is earlier.

g. As required by the Final Environmental Impact Report for the Steam Generator Replacement Projects, Best Management Practices (BMP) will be employed for all construction activities, including lay-down areas and construction yards, to protect against polluted storm water runoff.

Phasing Plan

2. The project shall be constructed in a single phase.

Approved Plans

3. Construction of the project shall conform to the approved site plans, grading plans and other plans approved by state and local agencies. The applicant shall submit a construction permit application to the Department of Planning and Building for review and approval for all elements of the project prior to commencement of any construction activities.

Other Agency Approvals

4. **Prior to issuance of a construction permit**, the applicant shall submit evidence to the Department of Planning and Building, to the satisfaction of the Director, that the applicant has secured necessary permits from the following agencies:

   a. California Dept of Forestry/County Fire Department
   b. California Regional Water Quality Control Board
   c. California Dept of Fish and Game
   d. Air Pollution Control District

e. Environmental Health
f. Other agencies that may have permitting authority for the project or at the site.

Fire Safety

5. **Prior to issuance of a construction permit**, the applicant shall submit evidence to the Department of Planning and Building that the CDF/County Fire Dept has approved a fire safety plan for the project. An MOU between the applicant and CDF/County Fire must be reviewed and approved by CDF/County Fire dept prior to the issuance of any construction permits. At a minimum, the Fire Safety Plan shall consist of the following elements:

   a. A policy and procedure will be written and approved giving an exemption to the "No Flight Zone" over the DCNPP allowing over flights for Fire Protection, Medical and Law Enforcement Agencies' Fixed and Rotary Wing Aircraft. This will include privately owned emergency contract aircraft assigned to the emergency, especially during the events of a wildland fire, rescue or law enforcement activity. This procedure will be shared with Diablo Canyon Security Forces, California Highway Patrol, San Luis Obispo County Sheriffs Department, Medical Helicopter Companies, CDF, United States Forest Service, Coast Guard and other emergency responders. This condition will be met prior to the signing of the annual MOU between CDF and PG&E.

   b. A fire hydrant system will be installed at the OSG facility and the facilities in proximity. The fire hydrant system must meet the requirements of the California Fire Code as adopted by the County of San Luis Obispo. This system will be installed prior to the movement of the OSG to the OSG facility. The design of this system, and any other fire suppression system, shall be approved by CDF/San Luis Obispo County Fire Department. The systems shall be designed by a licensed Fire Protection Engineer qualified in the design of systems of this nature. The Fire Protection Engineer must be approved by the CDF/San Luis Obispo County Fire Chief. This condition must be met prior to construction of the project.

   c. PG&E will maintain the vegetation in the area identified in the PG&E Wildlands Fuel Management Plan dated February 1999 to a Fuel Model 1 or 5 (Anderson, 1982) with a live/dead fuel load of less than 3.5 tons per acre. The plan and implementation of the plan will be reviewed and approved by CDF/San Luis Obispo County Fire Department annually at the time of the signing of the annual MOU.

   d. Emergency Response and Planning. Emergency fire and life safety response plans commensurate with those responsibilities and authority consistent with the risks of the power plant will be reviewed, approved and verified for efficacy annually prior to the signing of the annual MOU. These risks will include fire protection, radiological emergencies, rescues, hazardous materials and or medical emergencies. Technical assistance required by the agencies to review the plans will be funded by PG&E.

      i. PG&E will write a policy and procedure that will alert offsite responders to the radiation levels or to other hazardous plumes as they respond to or are

at scene of an emergency at the DCPP. This condition will be met prior to occupancy of the project.

ii. The fire life safety response plans for onsite and offsite responders will continue to be evaluated by a subject matter expert provided by PG&E who is approved by CDF/San Luis Obispo County Fire Department when either the Fire Chief or PG&E determine a need because of a substantive change in policies, procedure or requirements. PG&E will provide this expert for no more than 80 hours each year. This condition will be met prior to the signing of the annual MOU.

iii. A clearly established jurisdictional responsibility and authority matrix will be created that delineates the authority and boundary of that authority for NRC and local public protection agencies. The jurisdictional authority for fire protection related to the OSG Storage Facility, ISFSI, the power block, and the areas outside the power block must be clearly established for both fire prevention and fire protection. This condition will be met prior to occupancy of the OSG facility.

iv. Radio communication by offsite responders must be constant throughout the access routes into the plant and at the plant site. This communication must include contact with onsite personnel and offsite emergency dispatch centers, both law enforcement and fire. This condition will be met prior to occupancy of project.

v. PG&E will develop an emergency medical and rescue component for onsite at DCPP as part of the Emergency Plan. CDF/San Luis Obispo County Fire will review and approve emergency medical and rescue plans. This condition will be met prior to the signing of the annual MOU.

e. PG&E will develop a policy and procedure for training requirements for its Industrial Fire Brigade.

i. The required level of training for the Industrial Fire Brigade will be set at a minimum outlined in Table 1 or to a level approved by the County Fire Chief:

ii. Proficiency exercises for the Industrial Fire Brigade will include the following and be reviewed by CDF/San Luis Obispo County Fire Department prior to signing of the annual MOU:

1. Demonstrate annually that the firefighters can perform single engine company evolutions that include, interior fire attack, high-rise initial fire attack, hazardous material spill, confine space rescue, wildland fire initial attack, vehicle accident extrication, emergency medical response, ladder evolutions, and high angle rescue operations. This will be recorded in training task books for all brigade employees and signed by a certified instructor for the subject.

2. Through drills, demonstrate annually the ability to coordinate an offsite fire response for a major emergency that would augment the Industrial

Fire Brigade, including the effective use of the Incident Command System (ICS) and strategic and tactical evolutions. This drill will be consistent with the emergency response plan and include initial and secondary onsite and offsite responders as identified in the plan. This may be done through both table top and field exercises. The cost for overtime incurred by offsite agencies and extraordinary expenditures will be borne by PG&E.

3. Define the NRC requirements and industry standards for an Industrial Fire Brigade assigned to a Nuclear Power Generating Facility. The above exercises must fully meet or exceed these standards.

iii. PG&E will provide annual training to fire agency responders, CDFand other agencies, who respond to an initial and secondary response plan to DCPP as identified in the Emergency Plan. This training will be on aspects of the Emergency Plan and be conducted by a PG&E identified subject expert approved by the Fire Chief. The cost for preparation and delivery for this annual training will be borne by PG&E.

iv. The fire brigade will conduct and document a minimum of one drill in the protected area a month for all fire personnel.

v. Training films or other similar media will be produced by PG&E with coordination from the County OES on the subject of both onsite and offsite response to a radiological emergency and to an onsite emergency of any type consistent with the Emergency Plan. The films will be produced, or the funds encumbered and a bond issued, prior to the issuance of a clearance letter for the Old Steam Generator Storage Project or the ISFSI project whichever is completed first. The films will be approved by the Fire Chief.

f. With the construction of the new fire station at DCPP, the PG&E Industrial Fire Brigade will meet the requirements of the National Fire Protection Association (NFPA) 1710 response time criteria that the first engine arrive at scene time within 4 minutes 90% of the time and that there be a sufficient number of trained personnel to initiate an interior fire attack consistent with NFPA, OSHA (2 in 2 out) and NRC guidelines.

PG&E has in place several mitigation measures that improve fire protection and help mitigate the long response times for the full alarm. These include, sprinklered buildings, a 5 person staffed fire engine, a fire protection maintenance program and class 2 standpipes (hose reel stations). However, in order to mitigate the requirement that the initial full alarm must arrive within 8 minutes 90% of the time for a fire in a large building on the plant site PG&E will meet **one** of the following requirements to satisfy the **intent** of NFPA 1710 and OSHA requirements (2 in 2 out from 2 separate locations):

- Adequately staff and train the PG&E Reserve Industrial Fire Brigade so that a minimum of 9 personnel (professional and reserve) are able to respond to an emergency at the plant within 8 minutes.

Or

- Provide a total of 9 on duty PG&E professional Industrial Fire Brigade personnel who are fully trained.

Or

- Provide funding to CDF/San Luis Obispo County Fire Department to augment by 2 additional on duty personnel at the Avila Valley Fire Station 62.

g. A building evacuation plan will be developed that is exercised annually for each building with an occupancy over 49 people. A log will be kept onsite documenting the evacuation drills for review by CDF. This condition will be met prior to the signing of the annual MOU.

h. The Industrial Fire Brigade will have a fire engine in full working condition at the DCPP at all times that meets NFPA requirements commensurate with the risks associated with this plant. This equipment needs to be in top working order with down for maintenance. A policy and procedure will be developed with a replacement plan for the fire engine that will not exceed 20 years. If the current engine is over 20 years old it will be replaced prior to occupancy of this project. This condition will be met prior to the signing of the annual MOU.

i. The fire hose and all other equipment on the fire engine must be in full working condition according to NFPA standards. The current fire hose is reported by a third party review to be in poor condition and must be replaced prior to occupancy of the OSG facility. A full complement of hose is required along with a back-up supply.

j. If it is determined through the review of the emergency plans that a deficiency exists in specialized equipment requirements, PG&E will provide that specialized equipment either for their Industrial Fire Brigade or for offsite emergency responders. This includes fire protection, radiological emergencies, rescues, hazardous materials and or medical emergencies. This condition will be met prior to the signing of the annual MOU.

k. PG&E will provide current industry standard personal radiation monitoring devices for off site responders prior to occupancy of project.

l. When required CDF/San Luis Obispo County Fire Department will be included in the planning and implementation of the Public Education Program either directly or through the County Office of Emergency Services. This condition will be met prior to the signing of the annual MOU.

m. Access and egress to DCPP will be by two access roads that are not blocked other than by a security gate that is accessible to CDF/San Luis Obispo County Fire Department. The roads will meet the minimum CDF/San Luis Obispo County Fire Department standards for two way roads. When the primary access road is blocked during construction or during the transportation of the OSG, then the secondary access road must be clear of all obstructions. Provisions for access and egress must be maintained at all times or a citation could be issued.

n. Provide reimbursement fees to CDF/San Luis Obispo County Fire Department for a qualified fire inspector to conduct an annual fire inspection of the Diablo Canyon Power Plant Facility including power block, and support facilities consistent with authority and jurisdiction. The rate will be according to the fee schedule adopted by the San Luis Obispo County Board of Supervisors (currently $62.00 per hour) not to exceed 40 hours per year. This condition will be met prior to the signing of the annual MOU.

6. **Prior to use of any proposed structure**, the applicant shall obtain final inspection and approval from CDF of all required fire/life safety measures.

Services

7. **Prior to issuance of construction permit**, the applicant shall submit evidence that there is adequate water to serve the proposal on the site.

8. **Prior to issuance of construction permit**, the applicant shall submit evidence that a septic system, adequate to serve the proposal, can be installed on the site.

Site Development

9. **At the time of application for construction permits** plans submitted shall show all development consistent with the approved site plan, floor plan, architectural elevations and landscape plan.

10. **At the time of application for construction permits,** the applicant shall provide details on any proposed exterior lighting, if applicable. The details shall include the height, location, and intensity of all exterior lighting. All lighting fixtures shall be shielded so that neither the lamp or the related reflector interior surface is visible from adjacent properties. Light hoods shall be dark colored.

Fees

11. **Prior to issuance of a construction permit**, the applicant shall pay all applicable school and public facilities fees.

Grading, Drainage, Sedimentation and Erosion Control

12. **At the time of application for construction permits**, the applicant shall submit a drainage plan for review and approval by the County Public Works Department. The plan shall contain, at a minimum:

    a. Limits of the 100 year flood inundation and any other flood hazard combining designation information.

    b. Complete drainage calculations for county Public Works review and approval.

    c. Detention of drainage in an on-site basin designed in accordance with county standards and approved by the county Public Works.

d. All runoff from impervious surfaces such as roofs, driveways, walks, patios, decks, shall be collected and detained on-site, or passed on through an effective erosion control devise or drainage system approved by the County Engineer.

e. Permanent erosion control devises shall be installed prior to or concurrently with on-site grading activities.

f. Grading, filling or site disturbance of existing soil and vegetation shall be limited to the minimum areas necessary.

g. Stockpiles and other disturbed soils shall be protected from rain and erosion by plastic sheets or other covering.

13. **Prior to issuance of construction permits,** if grading is to occur between October 15 to April 15, a sedimentation and erosion control plan shall be submitted pursuant to Coastal Zone Land Use Ordinance Section 23.05.036.

Coastal Access

14. **Prior to issuance of a construction permit**, the applicant shall fund the following coastal access enhancement projects The total cost is not to exceed $1.5 million.

a. Contribute up to $700,000 to the construction of the Point San Luis Lighthouse road improvement project.

b. Contribute up to $300,000 (or construct the equivalent) to remove barriers to coastal access along the Pecho Coast Trail to the Point San Luis Lighthouse (i.e. Main gate).

c. Contribute up to $150,000 for disabled access vans (minimum 20 passenger) for enhanced access to the lighthouse.

d. Contribute up to $300,000 for the design, permitting and/or construction of an Avila Beach-Port San Luis pedestrian/bicycle pathway.

e. Submit an easement document for the lighthouse road to the Port District for their approval.

15. Funding and easement document approval by the Port shall occur prior to issuance of any construction permits.

Construction Permits

16. The applicant shall submit construction permit applications for all grading activities and all new construction for review and approval.

Effective Dates

17. This land use permit is valid for a period of 24 months from its effective date unless time extensions are granted pursuant to Land Use Ordinance Section 23.02.050 or the land use permit is considered vested. This land use permit is considered to be vested once a construction permit has been issued and substantial site work has been completed. Substantial site work is defined by Land Use Ordinance Section 23.02.042 as site work progressed beyond grading and completion of structural foundations; and construction is occurring above grade.

Time Frames

18. All conditions of this approval shall be strictly adhered to, within the time frames specified, and in an on-going manner for the life of the project. Failure to comply with these conditions of approval may result in an immediate enforcement action by the Department of Planning and Building. If it is determined that violation(s) of these conditions of approval have occurred, or are occurring, this approval may be revoked pursuant to Section 23.10.160 of the Land Use Ordinance.

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EXHIBIT E
CONDITIONAL USE PERMIT
CONDITIONS OF APPROVAL

Approved Development

1. This approval authorizes the construction and operation of an 18,000 sq ft building to store up to eight lightly radioactive (LLRW) original steam generators from the Diablo Canyon Nuclear Power Plant until the plant is decommissioned.

Conditions required to be completed at the time of application for construction permits

Site Development

2. **At the time of application for construction permits** plans submitted shall show all development consistent with the approved site plan, floor plan, architectural elevations and landscape plan. The applicant shall submit a construction permit application to the Department of Planning and Building for review and approval for all elements of the project prior to commencement of any construction activities

Phasing Plan

3. The project shall be constructed in a single phase.

Other Agency Approvals

4. **Prior to issuance of a construction permit**, the applicant shall submit evidence to the Department of Planning and Building, to the satisfaction of the Director, that the applicant has secured necessary permits from the following agencies:

   a. California Dept of Forestry/County Fire Department
   b. California Regional Water Quality Control Board
   c. California Dept of Fish and Game
   d. Air Pollution Control District
   e. Environmental Health
   f. Other agencies that may have permitting authority for the project or at the site.

Fire Safety

5. **Prior to issuance of a construction permit**, the applicant shall submit evidence to the Department of Planning and Building that the CDF/County Fire Dept has approved a fire safety plan for the project. An MOU between the applicant and CDF/County Fire must be reviewed and approved by CDF/County Fire dept prior to the issuance of any construction permits. At a minimum, the Fire Safety Plan shall consist of the following elements:

   a. A policy and procedure will be written and approved giving an exemption to the "No Flight Zone" over the DCNPP allowing over flights for Fire Protection, Medical and Law Enforcement Agencies' Fixed and Rotary Wing Aircraft. This will include privately owned emergency contract aircraft assigned to the emergency, especially during the events of a wildland fire, rescue or law enforcement activity. This procedure will be shared with Diablo Canyon Security Forces, California Highway

Patrol, San Luis Obispo County Sheriffs Department, Medical Helicopter Companies, CDF, United States Forest Service, Coast Guard and other emergency responders. This condition will be met prior to the signing of the annual MOU between CDF and PG&E.

b. A fire hydrant system will be installed at the OSG facility and the facilities in proximity. The fire hydrant system must meet the requirements of the California Fire Code as adopted by the County of San Luis Obispo. This system will be installed prior to the movement of the OSG to the OSG facility. The design of this system, and any other fire suppression system, shall be approved by CDF/San Luis Obispo County Fire Department. The systems shall be designed by a licensed Fire Protection Engineer qualified in the design of systems of this nature. The Fire Protection Engineer must be approved by the CDF/San Luis Obispo County Fire Chief. This condition must be met prior to construction of the project.

c. PG&E will maintain the vegetation in the area identified in the PG&E Wildlands Fuel Management Plan dated February 1999 to a Fuel Model 1 or 5 (Anderson, 1982) with a live/dead fuel load of less than 3.5 tons per acre. The plan and implementation of the plan will be reviewed and approved by CDF/San Luis Obispo County Fire Department annually at the time of the signing of the annual MOU.

d. Emergency Response and Planning. Emergency fire and life safety response plans commensurate with those responsibilities and authority consistent with the risks of the power plant will be reviewed, approved and verified for efficacy annually prior to the signing of the annual MOU. These risks will include fire protection, radiological emergencies, rescues, hazardous materials and or medical emergencies. Technical assistance required by the agencies to review the plans will be funded by PG&E.

   i. PG&E will write a policy and procedure that will alert offsite responders to the radiation levels or to other hazardous plumes as they respond to or are at scene of an emergency at the DCPP. This condition will be met prior to occupancy of the project.

   ii. The fire life safety response plans for onsite and offsite responders will continue to be evaluated by a subject matter expert provided by PG&E who is approved by CDF/San Luis Obispo County Fire Department when either the Fire Chief or PG&E determine a need because of a substantive change in policies, procedure or requirements. PG&E will provide this expert for no more than 80 hours each year. This condition will be met prior to the signing of the annual MOU.

   iii. A clearly established jurisdictional responsibility and authority matrix will be created that delineates the authority and boundary of that authority for NRC and local public protection agencies. The jurisdictional authority for fire protection related to the OSG Storage Facility, ISFSI, the power block, and the areas outside the power block must be clearly established for both fire prevention and fire protection. This condition will be met prior to occupancy of the OSG facility.

   iv. Radio communication by offsite responders must be constant throughout the access routes into the plant and at the plant site. This communication must include contact with onsite personnel and offsite emergency dispatch centers, both law enforcement and fire. This condition will be met prior to occupancy of project.

v. PG&E will develop an emergency medical and rescue component for onsite at DCPP as part of the Emergency Plan. CDF/San Luis Obispo County Fire will review and approve emergency medical and rescue plans. This condition will be met prior to the signing of the annual MOU.

e. PG&E will develop a policy and procedure for training requirements for its Industrial Fire Brigade.

i. The required level of training for the Industrial Fire Brigade will be set at a minimum outlined in Table 1 or to a level approved by the County Fire Chief:

ii. Proficiency exercises for the Industrial Fire Brigade will include the following and be reviewed by CDF/San Luis Obispo County Fire Department prior to signing of the annual MOU:

1. Demonstrate annually that the firefighters can perform single engine company evolutions that include, interior fire attack, high-rise initial fire attack, hazardous material spill, confine space rescue, wildland fire initial attack, vehicle accident extrication, emergency medical response, ladder evolutions, and high angle rescue operations. This will be recorded in training task books for all brigade employees and signed by a certified instructor for the subject.

2. Through drills, demonstrate annually the ability to coordinate an offsite fire response for a major emergency that would augment the Industrial Fire Brigade, including the effective use of the Incident Command System (ICS) and strategic and tactical evolutions. This drill will be consistent with the emergency response plan and include initial and secondary onsite and offsite responders as identified in the plan. This may be done through both table top and field exercises. The cost for overtime incurred by offsite agencies and extraordinary expenditures will be borne by PG&E.

3. Define the NRC requirements and industry standards for an Industrial Fire Brigade assigned to a Nuclear Power Generating Facility. The above exercises must fully meet or exceed these standards.

iii. PG&E will provide annual training to fire agency responders, CDFand other agencies, who respond to an initial and secondary response plan to DCPP as identified in the Emergency Plan. This training will be on aspects of the Emergency Plan and be conducted by a PG&E identified subject expert approved by the Fire Chief. The cost for preparation and delivery for this annual training will be borne by PG&E.

iv. The fire brigade will conduct and document a minimum of one drill in the protected area a month for all fire personnel.

v. Training films or other similar media will be produced by PG&E with coordination from the County OES on the subject of both onsite and offsite response to a radiological emergency and to an onsite emergency of any type consistent with the Emergency Plan. The films will be produced, or the funds encumbered and a bond issued, prior to the issuance of a clearance letter for the Old Steam Generator Storage Project or the ISFSI project whichever is completed first. The films will be approved by the Fire Chief.

f. With the construction of the new fire station at DCPP, the PG&E Industrial Fire Brigade will meet the requirements of the National Fire Protection Association (NFPA) 1710 response time criteria that the first engine arrive at scene time within 4 minutes 90% of the time and that there be a sufficient number of trained personnel to initiate an interior fire attack consistent with NFPA, OSHA (2 in 2 out) and NRC guidelines.

PG&E has in place several mitigation measures that improve fire protection and help mitigate the long response times for the full alarm. These include, sprinklered buildings, a 5 person staffed fire engine, a fire protection maintenance program and class 2 standpipes (hose reel stations). However, in order to mitigate the requirement that the initial full alarm must arrive within 8 minutes 90% of the time for a fire in a large building on the plant site PG&E will meet **one** of the following requirements to satisfy the **intent** of NFPA 1710 and OSHA requirements (2 in 2 out from 2 separate locations):

- Adequately staff and train the PG&E Reserve Industrial Fire Brigade so that a minimum of 9 personnel (professional and reserve) are able to respond to an emergency at the plant within 8 minutes.

Or

- Provide a total of 9 on duty PG&E professional Industrial Fire Brigade personnel who are fully trained.

Or

- Provide funding to CDF/San Luis Obispo County Fire Department to augment by 2 additional on duty personnel at the Avila Valley Fire Station 62.

g. A building evacuation plan will be developed that is exercised annually for each building with an occupancy over 49 people. A log will be kept onsite documenting the evacuation drills for review by CDF. This condition will be met prior to the signing of the annual MOU.

h. The Industrial Fire Brigade will have a fire engine in full working condition at the DCPP at all times that meets NFPA requirements commensurate with the risks associated with this plant. This equipment needs to be in top working order with down for maintenance. A policy and procedure will be developed with a replacement plan for the fire engine that will not exceed 20 years. If the current engine is over 20 years old it will be replaced prior to occupancy of this project. This condition will be met prior to the signing of the annual MOU.

i. The fire hose and all other equipment on the fire engine must be in full working condition according to NFPA standards. The current fire hose is reported by a third party review to be in poor condition and must be replaced prior to occupancy of the OSG facility. A full complement of hose is required along with a back-up supply.

j. If it is determined through the review of the emergency plans that a deficiency exists in specialized equipment requirements, PG&E will provide that specialized equipment either for their Industrial Fire Brigade or for offsite emergency responders. This includes fire protection, radiological emergencies, rescues, hazardous materials and or medical emergencies. This condition will be met prior to the signing of the annual MOU.

k. PG&E will provide current industry standard personal radiation monitoring devices for off site responders prior to occupancy of project.

l. When required CDF/San Luis Obispo County Fire Department will be included in the planning and implementation of the Public Education Program either directly or through the County Office of Emergency Services. This condition will be met prior to the signing of the annual MOU.

m. Access and egress to DCPP will be by two access roads that are not blocked other than by a security gate that is accessible to CDF/San Luis Obispo County Fire Department. The roads will meet the minimum CDF/San Luis Obispo County Fire Department standards for two way roads. When the primary access road is blocked during construction or during the transportation of the OSG, then the secondary access road must be clear of all obstructions. Provisions for access and egress must be maintained at all times or a citation could be issued.

n. Provide reimbursement fees to CDF/San Luis Obispo County Fire Department for a qualified fire inspector to conduct an annual fire inspection of the Diablo Canyon Power Plant Facility including power block, and support facilities consistent with authority and jurisdiction. The rate will be according to the fee schedule adopted by the San Luis Obispo County Board of Supervisors (currently $62.00 per hour) not to exceed 40 hours per year. This condition will be met prior to the signing of the annual MOU.

6. **Prior to use of any proposed structure**, the applicant shall obtain final inspection and approval from CDF of all required fire/life safety measures.

Fees

7. **Prior to issuance of a construction permit**, the applicant shall pay all applicable school and public facilities fees

Grading, Drainage, Sedimentation and Erosion Control

8. **At the time of application for construction permits**, the applicant shall submit a drainage plan for review and approval by the County Public Works Department. The plan shall contain, at a minimum:

a. Limits of the 100 year flood inundation and any other flood hazard combining designation information.

b. Complete drainage calculations for county Public Works review and approval.

c. Detention of drainage in an on-site basin designed in accordance with county standards and approved by the county Public Works.

d. All runoff from impervious surfaces such as roofs, driveways, walks, patios, decks, shall be collected and detained on-site, or passed on through an effective erosion control devise or drainage system approved by the County Engineer.

e. Permanent erosion control devises shall be installed prior to or concurrently with on-site grading activities.

f. Grading, filling or site disturbance of existing soil and vegetation shall be limited to the minimum areas necessary.

g. Stockpiles and other disturbed soils shall be protected from rain and erosion by plastic sheets or other covering.

9. **Prior to issuance of construction permits,** if grading is to occur between October 15 to April 15, a sedimentation and erosion control plan shall be submitted pursuant to Coastal Zone Land Use Ordinance Section 23.05.036.

Services

10. **Prior to issuance of construction permit**, the applicant shall submit evidence that there is adequate water to serve the proposal on the site.

11. **Prior to issuance of construction permit**, the applicant shall submit evidence that a septic system, adequate to serve the proposal, can be installed on the site.

Effective Dates

12. This land use permit is valid for a period of 24 months from its effective date unless time extensions are granted pursuant to Land Use Ordinance Section 23.02.050 or the land use permit is considered vested. This land use permit is considered to be vested once a construction permit has been issued and substantial site work has been completed. Substantial site work is defined by Land Use Ordinance Section 23.02.042 as site work progressed beyond grading and completion of structural foundations; and construction is occurring above grade.

Time Frames

13. All conditions of this approval shall be strictly adhered to, within the time frames specified, and in an on-going manner for the life of the project. Failure to comply with these conditions of approval may result in an immediate enforcement action by the Department of Planning and Building. If it is determined that violation(s) of these conditions of approval have occurred, or are occurring, this approval may be revoked pursuant to Section 23.10.160 of the Land Use Ordinance.

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EXHIBIT F

MITIGATION MONITORING PROGRAM

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Air Quality

Impact A-1:	Replacement activities would cause emissions from transport and construction equipment.
Mitigation A-1a:	Develop and implement a trip reduction plan. PG&E shall develop and implement a Trip Reduction Plan in cooperation with the SLOAPCD and CPUC to provide emission and congestion benefits for the duration of the steam generator replacement project. The goal of the plan shall be to achieve an average project-worker vehicle trip reduction of 50 percent as established by Mitigation Measure T-3a. The plan shall be approved by the SLOAPCD and CPUC at least 60 days before commencement of transport or construction activities.
Location:	All work areas.
Monitoring/Reporting Action:	Provide Construction Activity Management Plan (CAMP) including a Trip Reduction Plan approved by SLOAPCD to CPUC before commencing transport or construction activities.
Effectiveness Criteria:	Evidence of plan success by periodic observation of vehicle counts.
Responsible Agency:	CPUC, SLOAPCD
Timing:	During all steam generator replacement activities.
Mitigation A-1b:	Develop and implement a diesel combustion emission control plan. PG&E shall develop and implement a Diesel Combustion Emission Control Plan to implement the SLOAPCD recommendation of Best Available Control Technology for construction equipment (CBACT). The plan shall specify use of diesel combustion emission control measures consistent with recommendations identified in the most-recent SLOAPCD CEQA Air Quality Handbook, such as, but not limited to idling limitations, diesel oxidation catalysts, catalyzed diesel particulate filters, or other District approved emission reduction retrofit devices. The plan and CBACT approach shall be developed in cooperation with SLOAPCD and CPUC staff before commencing transport or construction activities. The complete plan shall be submitted to the CPUC at least 60 days prior to transport or construction activities.

Location:	All work areas.
Monitoring/Reporting Action:	Provide Construction Activity Management Plan (CAMP) including a Diesel Combustion Emission Control Plan approved by SLOAPCD to CPUC before commencing transport or construction activities.
Effectiveness Criteria:	Evidence of plan success by periodic inspection of diesel equipment.
Responsible Agency:	CPUC, SLOAPCD
Timing:	During all steam generator replacement activities.
Mitigation A-1c:	Offset tugboat NOx emissions with an offsite mitigation program. PG&E shall develop and implement or fund an offsite mitigation program that provides 1.544 tons of NOx reductions from existing sources in the Avila Beach and Port San Luis communities. PG&E shall initiate this program such that the emission reduction project(s) is in place prior to commencing the RSG transport activities. PG&E shall accomplish this either by developing and implementing a program of reductions (e.g., installing diesel engine or marine vessel emission control systems) or by providing mitigation funding and a 15 percent administration fee to the SLOAPCD for emission-reducing projects identified by the SLOAPCD (e.g., through the Carl Moyer Program). If PG&E elects to implement its own emission reductions, then the approach shall be developed in cooperation with SLOAPCD and CPUC staff.
Location:	Avila Beach and Port San Luis.
Monitoring/Reporting Action:	Provide Construction Activity Management Plan (CAMP) including an offsite mitigation program approved by SLOAPCD to CPUC and implement before commencing offloading or transport activities.
Effectiveness Criteria:	Written description of mitigation program and record of program funding.
Responsible Agency:	CPUC, SLOAPCD

Timing:	Prior to and during replacement steam generator transport activities.
Mitigation A-1d:	Conduct an acute health hazard screening analysis for the toxic diesel component acrolein. At least 60 days prior to the start of transport activities, PG&E shall perform an acute health hazard screening analysis for acrolein emissions during offloading and transport activities at Port San Luis and submit the analysis to the SLOAPCD and CPUC. The health hazard index shall be identified for the point of maximum impact, and all locations with a health hazard index greater than 1.0 shall be identified. PG&E shall consult with SLOAPCD staff to determine the appropriate level of mitigation (e.g., by restricting access or changing the proposed sequence of activities to minimize emissions) if the screening analysis reveals a maximum health hazard index greater than 0.1. PG&E shall develop and implement a strategy approved by SLOAPCD for temporarily restricting public access from any location where the acute health hazard index would be greater than 1.0, if necessary, before commencing offloading or transport activities.
Location:	Avila Beach and Port San Luis
Monitoring/Reporting Action:	Provide copy of screening analysis to CPUC and access strategy approved by SLOAPCD, if necessary, before commencing offloading or transport activities.
Effectiveness Criteria:	Copy of screening analysis and evidence of approval by SLOAPCD
Responsible Agency:	CPUC, SLOAPCD
Timing:	Prior to replacement steam generator transport activities.
Impact A-2:	Construction of the Original Steam Generator Storage Facility would cause emissions from portable concrete batch sources.
Mitigation A-2a:	Use registered portable equipment. PG&E or its contractor shall (1) use portable concrete batch sources that are registered in the Statewide Portable Equipment Registration Program or permitted by the SLOAPCD; and (2) maintain the portable equipment according to the specifications of the Program or SLOAPCD. PG&E shall

	provide evidence to CPUC indicating that appropriate registration or permits are in place.
Location:	Onsite
Monitoring/Reporting Action:	Provide Construction Activity Management Plan (CAMP) approved by SLOAPCD with appropriate registration or permits for the affected sources.
Effectiveness Criteria:	Provide evidence of valid registration for sources to CPUC.
Responsible Agency:	CPUC, CARB or SLOAPCD
Timing:	Before and during construction of OSG Storage Facility.

Biological Resources

Impact B-3:	Vessel traffic would increase the likelihood of collisions with protected marine mammals.
Mitigation B-3a:	Marine Mammal Observer Training. Under the direction of PG&E, vessel operators shall be trained by a marine mammal expert, provided by PG&E, to recognize and avoid marine mammals. The operators shall be retrained annually. Retraining sessions shall focus on the identification of marine mammal species, the specific behavior of species common to the project area, and awareness of seasonal concentrations of marine mammals. In addition, PG&E shall meet with the vessel operator prior to final transport to Port San Luis to convey all requirements regarding marine mammal safety measures. PG&E shall also provide a minimum of two marine mammal observers on all support vessels during the spring and fall gray whale migration periods and during periods/seasons having high concentrations of marine mammals in the project area. PG&E shall provide written documentation to CPUC verifying meetings with the vessel operators and identifying the marine mammal observers. Gray whales can be present from December to May, with the greatest numbers in January during the southward migration. A secondary peak occurs in March during the northward migration. The observers shall have unobstructed views onboard each vessel and shall serve as lookouts so that collisions

	with marine mammals can be avoided. Additionally, PG&E shall provide to vessel operators and CPUC a contingency plan that focuses on avoidance procedures when marine mammals are encountered at sea. Minimum components of the plan shall include: 1) Vessel operators shall make every effort to maintain a distance of 1,000 feet from sighted whales and other threatened or endangered marine mammals or marine turtles; 2) Support vessels shall not cross directly in front of migrating whales or any other threatened or endangered marine mammals or marine turtles; 3) When paralleling whales, support vessels shall operate at a constant speed that is not faster than the whales; 4) Female whales shall not be separated from their calves; 5) Vessel operators shall not herd or drive whales; 6) If a whale engages in evasive or defensive action, support vessels shall drop back until the animal moves out of the area and 7) Any collisions with marine wildlife shall be reported promptly to Federal and State agencies including the National Marine Fisheries Service and the California Department of Fish and Game.
Location:	Transportation route between Ports of Los Angeles/Long Beach and Port San Luis.
Monitoring/Reporting Action:	Continuous monitoring, reporting only if incident occurs.
Effectiveness Criteria:	Avoidance of marine mammal strike.
Responsible Agency:	CPUC, CDFG, NMFS
Timing:	Prior to RSG Transport.
Impact B-5:	Vehicular travel into undisturbed areas could directly impact native vegetation.
Mitigation B-5a:	Delineation of Disturbance Limits. Limits of disturbance shall be clearly marked with construction fencing and approved by CPUC prior to project related activities at the site to ensure that there is no incursion of construction equipment or deposition of materials into habitats outside of the defined area. The construction fence shall remain in place for the duration of the active phase at the location.
Location:	Replacement Steam Generator Temporary Storage Area

Monitoring/Reporting Action:	CPUC shall verify placement, maintenance and compliance.
Effectiveness Criteria:	Fence remains intact for duration of project work at this location.
Responsible Agency:	CPUC
Timing:	Prior to project activities until end of active phase.
Impact B-6:	Deposition of excavated materials could result in indirect impacts to vegetation and wildlife habitat.
Mitigation B-6a:	Revegetation of Soil Disposal Areas. The applicant shall prepare and implement a revegetation plan to be approved by CPUC prior to approval of the project. The revegetation plan will provide for long-term stabilization and revegetation of the soil stockpile areas associated with the project. The plan shall provide for development of long-term native plant cover compatible with surrounding areas of undisturbed native vegetation and wildlife habitat using local genetic sources of seed or cuttings for all native plant material. The plan shall include provisions for regular monitoring, maintenance including replacement of plants as needed, exotic species control, and performance assessment by a qualified independent third-party monitor. The revegetated areas shall achieve at least 75 percent of the native cover of appropriate reference sites in the general vicinity of the impact area as approved by CPUC. This performance standard shall be met within five years.
Location:	Soil disposal area for OSG Storage Facility site.
Monitoring/Reporting Action:	Preparation of revegetation plan, implementation of plan, regular maintenance and monitoring events. The plan shall be submitted to and approved by the CPUC prior to approval of the project.
Effectiveness Criteria:	Meets 75 percent native cover performance criteria.
Responsible Agency:	CPUC
Timing:	Plan to be developed prior to project approval, measure to be implemented until performance standards are met.

Cultural Resources

Impact C-1:	Ground-disturbing activity may damage or destroy previously undetected cultural resources.
Mitigation C-1a:	Cultural Resources Treatment Plan (CRTP). PG&E shall develop a CRTP for potential cultural resources should construction of the TSAs require ground-disturbing activities, including procedures for protection and avoidance of Environmentally Sensitive Areas and Archaeological High-Probability Areas, and evaluation and treatment of the unexpected discovery of cultural resources including Native American burials; detailed reporting requirements by the Project archaeologist; curating any cultural materials collected during the Project; and requirements to specify that archaeologists and other discipline specialists meet the Professional Qualifications Standards mandated by the California OHP. Current project design ensures that known and recorded cultural resources will be avoided during construction, and operation and maintenance. Specific protective measures shall be defined in the CRTP to reduce the potential adverse impacts on any currently undetected cultural resources to less than significant levels. The CRTP shall be submitted to the CPUC for review and approval at least 60 days before the start of construction.
Location:	TSA Proposed Project, TSA Alternative A, TSA Alternative B and TSA Alternative C
Monitoring/Reporting Action:	CPUC to Review CRTP
Effectiveness Criteria:	Previously undetected cultural resources in designated sensitive areas are identified by the PG&E archaeological monitor. Previously undetected resources are properly managed after identification by the archaeological monitor as outlined in the CRTP.
Responsible Agency:	CPUC
Timing:	At least 60 days prior to the start of construction.
Mitigation C-1b:	Construction Monitoring. Archaeological monitoring shall be conducted by a qualified archaeologist familiar

	with the types of historic and prehistoric resources that could be encountered ground-disturbing construction. The qualifications of the principle archaeologist shall be approved by the CPUC.
Location:	TSA Proposed Project, TSA Alternative A, TSA Alternative B and TSA Alternative C
Monitoring/Reporting Action:	CPUC to approve qualifications of archaeological monitor. CPUC to coordinate with principal archaeologist to verify that PG&E archaeologist monitors the designated locations and follows procedures outlined in the CRTP in the event of unanticipated discoveries.
Effectiveness Criteria:	Previously undetected cultural resources in designated sensitive areas are identified by the PG&E archaeological monitor. Previously undetected resources are properly managed after identification by the archaeological monitor as outlined in the CRTP.
Responsible Agency:	CPUC
Timing:	During project construction, when ground-disturbing activity planned in locations.

Geology, Soils and Paleontology

Impact G-1:	Extremely heavy loads could mobilize unstable ground along transport route.
Mitigation G-1a:	Prevent overloading of unstable ground along transport route. Existing geotechnical reports shall be reviewed by PG&E/CPUC not less than one year prior to the scheduled transport of the RSGs. PG&E/CPUC shall determine if the existing reports provide sufficient information to establish that the load-bearing capacity of soils and geologic features at the offloading area or along the transport route would support the loads, or if additional studies are necessary. If new studies are necessary, they shall be completed not less than ten months prior to commencement of the proposed project. Either the existing geological reports or new studies shall meet the following performance criteria not less than six months before the scheduled start of transport activities: 1) Report clearly identifies any and all unstable portions

	of the transport route; 2) PG&E or its consultant shall develop plans for any necessary road improvements, which shall be reviewed by the CPUC or its consultant to ensure that proposed improvements would both (1) ensure ground stability of all roads to be used during transport, and (2) remain within the footprint of the proposed route (as defined in the proposed project or the Replacement Steam Generator Offloading Alternative) so as to ensure that there would be no additional environmental impacts. Any and all necessary road improvements shall be completed at least 60 days prior to the scheduled start of transport activities. The CPUC or its environmental monitor shall ensure construction activities remain within the defined road footprint. In addition, the CPUC or its consultant shall survey the transport route after the completion of construction but before the start of transport activities to ensure that all necessary improvements have been implemented on all roads to be used during transport.
Location:	Entire transport route.
Monitoring/Reporting Action:	Letter report providing summary of geotechnical reports reviewed; new reports if necessary; CPUC to review and approve any road improvements; CPUC to verify stability of road(s) after completion of all reports and construction but before transport.
Effectiveness Criteria:	Route not damaged during project; roadway capable of supporting heavy loads; no additional environmental impacts from stabilization of transport route.
Responsible Agency:	CPUC, County of San Luis Obispo, Port San Luis Harbor District.
Timing:	Prior to start of project (see text of measure for exact time limits).
Impact G-2:	Temporary effects of earthquake shaking could endanger worker safety.
Mitigation G-2a:	Protect workers from temporary effects of earthquake shaking. The Applicant shall produce a safety plan that specifically includes measures that will be taken to ensure

	worker safety during earthquake-caused ground shaking. Elements of the plan should include, but not be limited to the following: (a) a protocol for workers to follow in the event an earthquake occurs; (b) protocols for set-up and management of equipment during the loading, transport, offloading, staging, and installation phases of the project that address the potential effects of ground shaking; (c) training for workers so they will know what to do in the event of an earthquake. CPUC shall review the safety plan for consistency with California Occupational Safety and Health Standards and approve the safety plan prior to commencement of any proposed project activities.
Location:	Entire transport route.
Monitoring/Reporting Action:	Provide copy of Safety Plan.
Effectiveness Criteria:	No workers injured by effects of seismic shaking during project.
Responsible Agency:	CPUC, local planning agencies.
Timing:	Prior to start of proposed project.
Mitigation G-2b:	Prevent casualties caused by falling rocks. Rocks and boulders that are precariously situated above portions of the transport route shall be identified and evaluated to determine if they should be removed or stabilized prior to project commencement.
Location:	Entire transport route.
Monitoring/Reporting Action:	Provide letter report stating that the precarious rock survey has taken place and what action has been or will be taken.
Effectiveness Criteria:	No workers injured by falling rock during project.
Responsible Agency:	CPUC, County of San Luis Obispo
Timing:	Prior to transport of RSG's along route.
Impact G-3:	Ground shaking could compromise integrity of the OSG Storage Facility.

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Mitigation G-3a:	Long Term Seismic Program Update. The analyses completed for the Long Term Seismic Program shall be refined to incorporate new earthquake data that have been derived since publication of the LTSP. This update should be reviewed by the Diablo Canyon Independent Safety Committee, the NRC, and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design. Based on the updated information, a new Design Earthquake (the seismicity characteristics that structure is designed to withstand) shall be developed for the proposed OSG Storage Facility by PG&E. PG&E shall also confirm that the updated information has been submitted to the NRC for consideration in the OSG Storage Facility design plan.
Location:	Vicinity of all OSG Storage Facility potential locations.
Monitoring/Reporting Action:	Submit updated information to Diablo Canyon Independent Safety Committee, the NRC and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design.
Effectiveness Criteria:	Updated information on seismic hazards.
Responsible Agency:	CPUC, County of San Luis Obispo, NRC and Diablo Canyon Independent Safety Committee
Timing:	Prior to start of proposed project and at least 60 days prior to final approval of the OSG Storage Facility design.
Impact G-4:	Slope instability could affect design, construction, and functioning of the OSG Storage Facility.
Mitigation G-4a:	Evaluate slope stability in the vicinity of the OSG Storage Facility site. A geotechnical evaluation shall be undertaken by PG&E and/or the construction contractor to assess the stability of the north-facing slopes in the area of the proposed OSG Storage Facility, both above and below the level of the current "man camp." This report should be reviewed and approved by PG&E and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design. Such an evaluation shall include exploratory borings and surface mapping of the north-facing slope. Slope stability evaluation shall include analysis of the dip of layered rock, identification

of clay beds, and presence and orientation of small faults and fractures with orientations parallel or subparallel to the slope. Static and dynamic stability analysis shall be performed in accordance with all applicable building codes, considering the information developed under Mitigation Measure G-3.

If the report indicates either the upper or lower portion of the slope could become unstable, remedial measures (e.g., construction of engineered retaining wall; improved slope drainage; remove excess colluvium; engineering design of the structure to withstand postulated landslide loads) shall be developed or a different location for the OSG Storage Facility shall be selected.

Location: Vicinity of the OSG Storage Facility potential locations.

Monitoring/Reporting Action: Geotechnical report to CPUC at least 60 days prior to final approval of the OSG Storage Facility design.

Effectiveness Criteria: Engineering design to stabilize slope and protect improvements during construction and long-term operation.

Responsible Agency: CPUC, County of San Luis Obispo, NRC and Diablo Canyon Independent Safety Committee

Timing: Prior to start of proposed project and at least 60 days prior to final approval of the OSG Storage Facility design.

Hazards and Hazardous Materials

Impact H-1: Heavy equipment fuel, oil, or hydraulic line leak or rupture could cause hazardous materials release.

Mitigation H-1a: Implement DCPP Spill Response Procedures. In the event of a fuel, oil, or hydraulic line leak or rupture, collect spilled fluid with absorbent materials. Prevent or stop spill from spreading to the environment. In the event that a spill reaches bare soil, excavate impacted soil and dispose of with absorbent materials. In the event that a spill occurs on Port San Luis Harbor District property or in ocean water, Central Coast RWQCB and Harbor District personnel shall be immediately notified and corrective measures, such as containment, shall be taken

	immediately. A copy of the DCPP Spill Prevention Control and Countermeasure Plan shall remain with the contractor at all times. In addition, PG&E shall develop and implement a worker environmental training program that communicates to all appropriate personnel location-specific environmental concerns and appropriate work practices, including spill prevention and response measures, as well as site-specific physical conditions to lessen the impact of potential spills (i.e., identification of flow paths to sensitive resources). A copy of this plan shall be submitted for CPUC approval prior to commencement of RSG transport activities.
Location:	Transport routes, staging areas, construction sites and disposal area(s).
Monitoring/Reporting Action:	Per DCPP Spill Prevention Control and Countermeasure Plan report to RWQCB.
Effectiveness Criteria:	Continuous monitoring.
Responsible Agency:	CPUC
Timing:	Before and during all steam generator replacement activities.
Mitigation H-1b:	Conduct Routine Inspections and Maintenance of Transporter. All transporter vehicles shall be inspected at the beginning of each work day and at the end of each work shift. While in transport, continual visual inspections shall be conducted by the crew. If any leaks are observed during transport, appropriate action shall be taken to stop the leak prior to the continuance of transport. Any necessary spill response shall be conducted according to Mitigation Measure H-1a.
Location:	Transport routes.
Monitoring/Reporting Action:	Per DCPP Spill Prevention Control and Countermeasure Plan report to RWQCB.
Effectiveness Criteria:	Continuous monitoring.
Responsible Agency:	CPUC

Timing:	During transport of steam generators.
Impact H-2:	Heavy equipment maintenance could cause hazardous materials release.
Mitigation H-2a:	Properly Handle Maintenance Waste. Routine maintenance or unscheduled repairs shall be conducted on appropriate containment systems, and all fluids removed from vehicles or used for cleaning shall be properly contained, labeled, and manifested, according to the procedures of the DCPP Spill Prevention Control and Countermeasure Plan. All hazardous waste shall be properly disposed of in accordance with federal and state regulations, and local ordinances. Storage of hazardous material on property outside of DCPP (e.g., Port San Luis Harbor District) shall be prohibited unless a license (or agreement) from the property owner and an insurance policy or bond for clean-up are obtained. In addition, the worker environmental training program discussed in Mitigation Measure H-1a shall include discussion of material handling, storage, and disposal procedures per applicable regulations and designed to ensure hazardous materials are handled and contained safely.
Location:	Transport routes, staging areas, construction sites and disposal area(s).
Monitoring/Reporting Action:	Per DCPP Spill Prevention Control and Countermeasure Plan report to RWQCB.
Effectiveness Criteria:	Continuous monitoring.
Responsible Agency:	CPUC
Timing:	During all steam generator replacement activities.
Impact H-3:	Previously unknown contaminated soil/groundwater could be encountered during construction.
Mitigation H-3a:	Stop Work and Notify Appropriate Project Personnel and Regulators. If impacted soil and/or groundwater is encountered during excavation and/or groundwater dewatering, work shall stop immediately. Impacted soil shall be placed on 20-mil HDPE and covered. The construction superintendent, designated PG&E and CPUC personnel, and applicable regulatory agencies shall

	be notified immediately. Contingency planning for such an event shall be conducted prior to start of work. The nature and extent of contamination shall be identified through soil and/or water testing, and appropriate remedial action proposed and approved by the CPUC prior to disturbing additional material.
Location:	Proposed construction areas requiring excavation and/or groundwater dewatering.
Monitoring/Reporting Action:	Monitor excavated soil and/or pumped groundwater for potential impacts from previous and unknown unauthorized releases of hazardous materials. If encountered, stop work and notify superintendent, DCPP project manager and CPUC.
Effectiveness Criteria:	HAZWOper 24-hour Supervisor Training for the Construction Foreman and continuous monitoring.
Responsible Agency:	CPUC
Timing:	During construction excavation and/or dewatering.

Hydrology and Water Quality

Impact W-1:	Offloading the generators at Port San Luis could disturb marine sediments or accidentally introduce contaminants to the ocean water.
Mitigation:	See Mitigation Measures H-1a, H-1b and H-2a above.
Location:	See Mitigation Measures H-1a, H-1b and H-2a above.
Monitoring/Reporting Action:	See Mitigation Measures H-1a, H-1b and H-2a above.
Effectiveness Criteria:	See Mitigation Measures H-1a, H-1b and H-2a above.
Responsible Agency:	CPUC
Timing:	During all steam generator replacement activities.
Impact W-2:	Construction and use of staging and preparation areas could result in disturbance of sediments or spill of materials that would contaminate stormwater.

Mitigation W-2a:	A SWPPP shall be prepared for construction activities. PG&E shall prepare a SWPPP, and it shall be submitted to the CPUC and the County of San Luis Obispo for review and approval prior to construction activities regardless of disturbance area size. The SWPPP shall contain a site map which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP shall list Best Management Practices (BMPs) the discharger will use to protect against polluted storm water runoff. PG&E shall adhere to the SWPPP for all project-related construction activities. Should the total construction area exceed one acre in size, a Notice of Intent and the SWPPP shall be submitted to the RWQCB.
Location:	Laydown area and all construction areas. Also see Mitigation Measures H-1a and H-2a above.
Monitoring/Reporting Action:	SWPPP to be prepared and submitted to CPUC and County of San Luis Obispo for review and approval. Also see Mitigation Measures H-1a and H-2a above.
Effectiveness Criteria:	SWPPP to include monitoring and effectiveness criteria to the satisfaction of the CPUC. Also see Mitigation Measures H-1a and H-2a above.
Responsible Agency:	CPUC, County of San Luis Obispo and RWQCB
Timing:	During all steam generator replacement activities.
Impact W-3:	Fuel or other contaminants associated with heavy equipment used during OSG removal, transport, and storage could spill and contaminate surface waters.
Mitigation:	See Mitigation Measures H-1a and H-2a above.
Location:	See Mitigation Measures H-1a and H-2a above.
Monitoring/Reporting Action:	See Mitigation Measures H-1a and H-2a above.
Effectiveness Criteria:	See Mitigation Measures H-1a and H-2a above.
Responsible Agency:	CPUC

Timing:	During all steam generator replacement activities.
Impact W-4:	Fuel or other contaminants associated with heavy equipment used during RSG installation could spill and contaminate surface waters.
Mitigation:	See Mitigation Measures H-1a and H-2a above.
Location:	See Mitigation Measures H-1a and H-2a above.
Monitoring/Reporting Action:	See Mitigation Measures H-1a and H-2a above.
Effectiveness Criteria:	See Mitigation Measures H-1a and H-2a above.
Responsible Agency:	CPUC
Timing:	During all steam generator replacement activities.

Land Use, Recreation and Agriculture

Impact L-2:	Transport would disrupt recreational activities.
Mitigation L-2a:	Avoid peak recreational usage. PG&E shall not schedule offloading during times of peak recreational usage of Port San Luis (as defined by and coordinated with the Port San Luis Harbor District).
Location:	Port San Luis Harbor
Monitoring/Reporting Action:	Verification of offloading and transport schedule as compared to peak recreational usage of Port San Luis (as defined by and coordinated with the Port San Luis Harbor District).
Effectiveness Criteria:	Offloading occurs outside of peak recreational usage of Port San Luis (as defined by and coordinated with the Port San Luis Harbor District).
Responsible Agency:	CPUC, PG&E and Port San Luis Harbor District
Timing:	Pre-transport, Transport
Mitigation L-2b:	Schedule Pecho Coast Trail hikes around RSG transport. PG&E shall schedule the twice-weekly Pecho Coast Trail hikes such that they do not occur during transport activities. PG&E shall also ensure that the number of

	hiking opportunities does not diminish as a result of the proposed project. The number of hiking opportunities available shall meet or exceed the current level of twice-weekly hikes of up to 15 people per hike, as discussed above.
Location:	Pecho Coast Trail – Trailhead at Port San Luis Harbor
Monitoring/Reporting Action:	Verification of offloading and transport schedule as compared to scheduled hikes. Number of hiking opportunities as compared to current (Two hikes per week with 15 available spots on each hike).
Effectiveness Criteria:	Offloading and transport schedule does not occur at the same time as Pecho Coast Trail hikes. The number of hiking opportunities available meets or exceeds the current level of 15 people per hike, with two hikes per week, as discussed above.
Responsible Agency:	CPUC, PG&E
Timing:	Pre-transport, Transport

Noise and Vibration

Impact N-1:	Offloading would temporarily increase local noise levels near sensitive receptors.
Mitigation N-1a:	Provide advance notice of offloading and transport. PG&E shall provide advance notice of each phase of RSG delivery, between two and four weeks prior to offloading, of planned offloading and transport activities and timing to the CPUC, the Port San Luis Harbor District, Harbor District tenants, and nearby residents within the Port San Luis Trailer Park and the Harbor Terrace area of Port San Luis. The advance notice shall describe the potential noise disruption and the steps PG&E plans to take to minimize the noise (e.g., by enclosing and muffling equipment, eliminating backup signals or by limiting idling) and it shall provide a page in a format suitable for reproduction and posting by the Harbor District. PG&E shall also hold a meeting for Harbor District tenants between two and four weeks prior to offloading. If project delays of more than two weeks occur, an additional notice shall be made.

Location:	Port San Luis Harbor District, Port San Luis Trailer Park and Harbor Terrace
Monitoring/Reporting Action:	Provide notice of offloading activity to local receptors and evidence to CPUC.
Effectiveness Criteria:	Evidence of advance notice.
Responsible Agency:	CPUC
Timing:	Prior to and during offloading transport.
Mitigation N-1b:	Provide liaison for nuisance complaints. PG&E shall identify and provide a liaison person to respond to concerns of noise from offloading activities. Procedures for reaching the liaison via telephone or in person shall be included in notices distributed and posted in accordance with Mitigation Measure N-1a. Nuisance complaints filed with the liaison and the approach used by PG&E to resolve the complaint shall be reported to the CPUC and the Port San Luis Harbor District. Procedures for responding to callers shall be submitted to the CPUC for review and approval prior to offloading.
Location:	Port San Luis Harbor District, Port San Luis Trailer Park and Harbor Terrace
Monitoring/Reporting Action:	Provide complaint response procedures to the CPUC at least 60 days prior to offloading. Report complaints and resolution to CPUC.
Effectiveness Criteria:	Evidence of resolved complaints.
Responsible Agency:	CPUC, Port San Luis Harbor District
Timing:	During offloading activity.

Public Services and Utilities

Impact U-1:	Project would disrupt utility systems.
Mitigation:	See Mitigation Measure G-1a above.
Location:	See Mitigation Measure G-1a above.
Monitoring/Reporting Action:	See Mitigation Measure G-1a above.

Effectiveness Criteria:	See Mitigation Measure G-1a above.
Responsible Agency:	See Mitigation Measure G-1a above.
Timing:	See Mitigation Measure G-1a above.
Impact U-2:	Project would impede emergency access.
Mitigation U-2a:	Pre-position emergency responders during road blockages. The access plan submitted to PG&E by the transportation contractor shall include provisions for the pre-positioning of emergency vehicles and personnel prepared to respond to an emergency if access cannot be maintained along the transportation route for the RSGs. The Applicant shall coordinate with County emergency service providers and the Port San Luis Harbor District to determine the appropriate resources to be pre-positioned in case of an emergency. A copy of the access plan shall be provided to the CPUC for review and approval prior to any transport activities.
Location:	Along RSG and OSG transportation routes.
Monitoring/Reporting Action:	Review of transportation contactor access plan and monitoring of transport activities by CPUC and safety monitor.
Effectiveness Criteria:	Appropriate placement of emergency resources with access to DCPP if emergency access cannot be maintained.
Responsible Agency:	CPUC, CDF/San Luis Obispo County Fire Department and Port San Luis Harbor District
Timing:	Prior to and during transport activities.

System and Transportation Safety

Impact S-1:	RSG barges would create a navigational hazard in Port San Luis.
Mitigation S-1a:	Barge Navigational Safety Plan. The Applicant shall develop a barge navigational safety plan to minimize the impact on existing Port operations. The plan shall be submitted to, and approved by the Port San Luis Harbor

	District. At a minimum the plan shall include the following elements: 1) Identify moored vessels that will need to be temporarily relocated, and provide necessary temporary mooring facilities or funding for the Port District to accommodate the temporary relocation of moored vessels; 2) Identify activities such as home fleet and dry dock operations in the Port that may conflict with barge transport and/or offloading. Working with the Harbor District, identify procedures that will minimize conflicts with existing operations and safety hazards to the public and project personnel; 3) Identify hazardous wind and swell conditions that would create safety hazards during barge transport within Port San Luis and during barge unloading. Develop written procedures to avoid barge transport and unloading during conditions that would increase the risk of barge collision or capsizing, and conditions that could contribute to an accident during barge unloading and 4) Working with the Harbor District, identify additional navigational aids and security that will be necessary to safely move the barges through the Port. The applicant can provide the additional navigational aids and/or security, or contract with the Harbor District to provide the necessary services.
Location:	Port San Luis
Monitoring/Reporting Action:	Submit Navigational Safety Plan for approval.
Effectiveness Criteria:	Avoidance of vessel collisions and Port operations.
Responsible Agency:	CPUC and Port San Luis Harbor District
Timing:	Prior to RSG delivery.
Impact S-2:	RSG transport between Port San Luis and the DCPP could impede emergency response vehicles.
Mitigation:	See Mitigation Measure U-2a above.
Location:	See Mitigation Measure U-2a above.
Monitoring/Reporting Action:	See Mitigation Measure U-2a above.
Effectiveness Criteria:	See Mitigation Measure U-2a above.
Responsible Agency:	See Mitigation Measure U-2a above.

Timing:	See Mitigation Measure U-2a above.
Impact S-5:	Seismic activity could compromise the integrity of the OSG Storage Facility.
Mitigation:	See Mitigation Measure G-3a above.
Location:	See Mitigation Measure G-3a above.
Monitoring/Reporting Action:	See Mitigation Measure G-3a above.
Effectiveness Criteria:	See Mitigation Measure G-3a above.
Responsible Agency:	See Mitigation Measure G-3a above.
Timing:	See Mitigation Measure G-3a above.
Impact S-7:	Residual contamination would be present on the OSGs with the potential for radiation exposure during offsite transport.
Mitigation S-7a:	Alternate OSG Barge Loading Site. In order to avoid exposing the public to residual OSG contamination, the Applicant shall utilize the DCPP Intake Cove for OSG barge loading should offsite transport and storage be required.
Location:	DCPP, Port San Luis
Monitoring/Reporting Action:	Use alternate barge loading site.
Effectiveness Criteria:	Avoidance of impact.
Responsible Agency:	CPUC, Port San Luis Harbor District and NRC
Timing:	Prior to OSG removal.

Traffic and Circulation

Impact T-1:	RSG transport may damage roadway/parking infrastructure and would temporarily increase local traffic.

Mitigation T-1a:	Repair any damage to pavement from the transporter. The Applicant shall repair and bear any costs of repair of any significant damage to pavement (e.g., road or parking lots) that results from the transportation of the RSGs. The repairs shall bring the pavement to the pre-project or better condition.
Location:	Implementation of the measure would affect Avila Beach Drive, Diablo Canyon Road and any paved roads or parking lots within the Port San Luis. Monitoring and photo documentation shall be done at the Port's parking lot and along the transporter route.
Monitoring/Reporting Action:	Conduct site visits to assess the road and parking lot conditions before and after the transport, use photo documentation to assess the pre- and post-project pavement conditions. To ensure compliance, conduct a site visit after the repairs (if any) are reported as completed.
Effectiveness Criteria:	If the damaged pavement (if any) appears as good or better after the repairs (if any) are completed, the measure is effective.
Responsible Agency:	CPUC shall assign a qualified environmental monitor, that is also approved by the Harbor District to review the monitoring reports and establish and implement an enforcement action if the measure is not effective.
Timing:	Review before commencing the RSG transportation, conduct site visits during project implementation.
Impact T-2:	Staging and preparation would temporarily increase local traffic.
MitigationT-2a:	Avoid travel during peak season on Avila Beach Drive and other local surface roads. The applicant shall develop an alternative project schedule that would restrict the project-related personnel from travel on Avila Beach Drive during peak season (e.g., May to October), evening peak hours of between 4:00 p.m. and 7:00 p.m. In addition, all project-related traffic shall be restricted from travel on Avila Beach Drive during peak season (e.g., May to October) weekends between the hours of 10:00 a.m. and 5:00 p.m. To achieve this, the applicant shall not schedule project employee shift changes between 4:00

p.m. and 7:00 p.m. during May to October period, during weekdays. The applicant shall not schedule project-related or outage-related employee shift changes between the hours of 10:00 a.m. and 5:00 p.m. during May to October period during weekends.

Location: Implementation of the measure would affect Avila Beach transportation system. Monitoring shall be done at the DCPP secured Access Gate on Diablo Canyon Road.

Monitoring/Reporting Action: Review and approval of the alternative project schedule/shift change orders by CPUC. Conduct site visits during the project implementation to ensure compliance.

Effectiveness Criteria: If the applicant demonstrates approved observable shift schedule, the measure is effective.

Responsible Agency: CPUC shall assign a qualified environmental monitor, review the monitoring reports and establish and implement an enforcement action if the measures are not effective.

Timing: Review the alternative schedule before commencing RSG staging and preparation, conduct site visits during project implementation.

Mitigation T-2b: Avoid travel during peak time on Highway 101. The Applicant shall develop an alternative project schedule that would restrict the project-related personnel from travel on Highway 101 during peak hours of operation. Typically, morning peak hours are between 6:00 a.m. and 8:00 a.m. and evening peak hours are between 4:00 p.m. and 5:30 p.m.

To achieve this, in addition to the shift change restrictions in Mitigation Measure T-2a, the applicant shall schedule project employee shift changes outside of period between 6:00 a.m. and 8:00 a.m. during weekdays.

Location: Implementation of the measure would affect Highway 101 in Avila Beach vicinity. Monitoring shall be done at the DCPP Access Gate on Diablo Canyon Road.

Monitoring/Reporting Action: Review and approval of the alternative project schedule by CPUC. Site visits during the project implementation to ensure compliance.

Effectiveness Criteria:	If the applicant demonstrates approved observable shift schedule, the measure is effective.
Responsible Agency:	CPUC shall assign a qualified environmental monitor, review the monitoring reports and establish and implement an enforcement action if the measures are not effective.
Timing:	Review the alternative schedule before commencing RSG staging and preparation, conduct site visits during project implementation.
Impact T-3:	Steam generator replacement activities would temporarily increase local traffic.
Mitigation T-3a:	Develop a trip reduction program. The Applicant shall develop a trip reduction program for the Proposed Project. The goal of this program shall be to achieve a 50 percent reduction of project-related vehicle trips during all steam generator replacement activities that overlap with outage periods or normal operation. With such 50 percent reduction, not more than 3,160 vehicles would enter the plant during a 24-hour day. This limit represents vehicles from a normal workforce of 1,400 plus 1,285 outage workers with 475 project-related vehicles representing a two-person average vehicle occupancy for the 950 project-related workers. PG&E shall develop and maintain a daily count of vehicles entering the plant for verifying the success of this program. The program shall include but not be limited to the following activities: 1) Provide appropriate offsite parking for the project-related employees and provide a shuttle service between the offsite parking and DCPP. Any parking arrangements shall be approved by the County of San Luis Obispo (and the landowner of the space(s) proposed to be used for parking if not owned by the County) prior to the project commencement. Any parking fees shall be borne by the applicant; 2) Provide a shuttle that would be available to all personnel that would enter DCPP during the project, and institute a set of incentive-based measures that would encourage use of the shuttle by all personnel (i.e., regular employees, outage personnel and project-related workers); 3) Develop a work schedule that would prevent employees traveling on Avila Beach Drive and other local roadways during peak hours as specified in

	Mitigation Measure T-2a; 4) Institute administrative measures, potentially through the use of contract terms, to prohibit the project personnel from parking in the local communities such as Avila Beach or Port of San Luis; 5) Develop a construction materials and machinery delivery and waste removal program that would avoid project-related and other DCPP service truck traffic on Avila Beach Drive and other local roadways during peak hours as specified in Mitigation Measure T-2a and 6) Develop a public notification program that allows the public to be informed about the traffic reduction program, project schedule and potential traffic congestion. The trip reduction program shall be coordinated with and approved by the County of San Luis Obispo and the Port San Luis Harbor District. See also Mitigation Measures T-2a and T-2b above.
Location:	Monitoring visits shall be done to the alternative offsite parking sites. Review the DCPP documentation directing work and shift change schedules.
Monitoring/Reporting Action:	Review and approval of the trip reduction and traffic control program by CPUC. Site visits to ensure implementation.
Effectiveness Criteria:	If the total daily number of vehicles entering the plant is no more than 3,160, the measure is effective.
Responsible Agency:	CPUC shall assign a qualified environmental monitor, review the monitoring reports and establish and implement an enforcement action if the measures are not effective, coordination with County of San Luis Obispo and the Port San Luis Harbor District.
Timing:	Review and approve the trip reduction program before the project commencement. During the OSG's removal, transportation and storage.

Visual Resources

Impact V-1:	Short-term visibility of RSGs and transporters to viewers at Harford Pier and San Luis Obispo Bay Viewpoints.

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Mitigation V-1a:	Offloading and transport activities during off-season time periods. RSG offloading and transport shall occur from November through April. If transport during peak recreational season (May through October) is unavoidable, RSG offloading and transport to the DCPP Access Gate shall be timed to take place during weekdays, and should be limited to the shortest feasible period of time.
Location:	Harford Pier/Landing
Monitoring/Reporting Action:	CPUC/Harbor District to verify that offloading and transport activities will not take place on peak season weekends.
Effectiveness Criteria:	RSG offloading and transport will not interfere with visitor-serving businesses on peak season weekends, day or night.
Responsible Agency:	CPUC, Port San Luis Harbor District
Timing:	No later than 90 days prior to RSG shipment, the Port District shall be notified of schedule and arrangements shall be made to avoid weekend disturbance.
Mitigation V-1b:	Minimize disruptive night lighting in the vicinity of Harford Pier and San Luis Harbor. Nighttime project lighting shall be shielded and directed downward at Harford Pier to avoid subjecting vessel operators in the vicinity to night blindness. To the extent practicable, the Applicant shall also avoid evening transportation lighting between Port San Luis and the DCPP Access Gate on weekends during the peak tourist season (May through October).
Location:	Harford Pier/Landing
Monitoring/Reporting Action:	CPUC/Harbor District to verify that RSG transport activities in general, and night lighting in particular, do not take place on peak season weekends.
Effectiveness Criteria:	RSG offloading and transport will not interfere with visitor-serving businesses on peak season weekend nights.
Responsible Agency:	CPUC, Port San Luis Harbor District

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Timing:	No later than 30 days prior to RSG shipment, the Port District shall be notified of transport operation plans, including confirmation that peak weekend night lighting shall not be required.

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Avila Valley Advisory Council

San Luis Obispo County, California

P.O. Box 65
Avila Beach, CA 93424
www.AvilaValley.org

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December 13, 2005

Mr. Jerry Lenthall, Supervisor, Third District
County Government Center
1055 Monterey, Rm. D430
San Luis Obispo, CA 93408
jlenthall@co.slo.ca.us by fax 781-1350

Subject: Diablo Steam Generator Replacement Project

Dear Mr. Lenthall:

The Avila Valley Advisory Council (AVAC) respectfully requests that the Planning staff pursue further discussion with PG&E regarding the impacts of replacing steam generators on Diablo Canyon Power Plant (DCPP) operations. Continued denial of public coastal access should be compensated with benefits directed primarily toward the community of Avila Beach and Avila Valley since all traffic impacts created by the DCPP are absorbed by this area.

Our community is extremely concerned about ***public safety***, considering our single ingress and egress from Avila Beach. We believe there is a clear and present danger for public safety that is not being addressed to insure evacuation routes will not be overloaded during an actual emergency. We request consideration be given to an egress route sufficient to accommodate vehicles during an emergency.

Port San Luis is in the final stages of updating their Master Plan. A prominent feature of the plan is the creation of a walkway/bike path that would connect the town of Avila Beach to Port San Luis. This route is heavily impacted by Diablo traffic which poses a safety hazard to pedestrians and cyclists. Additionally, it is the only access route to the Point San Luis Lighthouse from Avila Beach, a project also in the Port San Luis Master Plan. A dedicated group of volunteers, the Point San Luis Lighthouse Keepers, has worked for nearly a decade restoring this historic lighthouse and has just completed the design of a project that would improve the 2-mile access road to the lighthouse. The time has come to provide a dedicated easement and fund the construction of the road improvements.

In summary, we offer these recommendations:

- Create an egress to accommodate vehicles in emergencies.
- Create a harbor walkway/bike path to connect Avila Beach to Port San Luis.
- Provide a dedicated easement and complete road improvements for the Lighthouse.
- Fund passenger vehicles for Lighthouse access.
- Accelerate installation of the traffic signal at First Street to provide pedestrian and bicycle safety at Bob Jones Bike Trail head.

Support of these projects as compensation for the Steam Generator project would be in the best interests of all parties; Avila Valley and Avila Beach residents, visitors to Avila Beach and Port San Luis, and Diablo employees as well.

Sincerely,

Bob Pusanik, Chair

C: Jerry Lenthall, Third District Supervisor (by fax 781-1350)
Tom Jones, PG&E
Victor Hollanda, Planning & Building
Jay Elder, Port San Luis
James Caruso, Planning & Building
Robert Vessely, Lighthouse
SLO Tribune